DOCUMENT RESUME

ED 065 649 UD 012 824

TITLE	Educating the Disadvantaged Child: Where We Stand. The 1972 Annual Report to the President and the Congress.
INSTITUTION	National Advisory Council on the Education of Disadvantaged Children, Washington, D.C.
REPORT NO	OE-72-121
PUB DATE	31 Mar 72
NOTE	49p.
AVAILABLE FROM	Superintendent of Documents, U.S. Government Printing Office, Washington, D.C. 20402 ($0.50)
EDRS PRICE	MF-$0.65 HC-$3.29
DESCRIPTORS	*Compensatory Education; Compensatory Education Programs; Delinquents; *Disadvantaged Youth; Educational Accountability; *Educationally Disadvantaged; Federal Programs; Migrant Education; Parent Participation; Private Schools; *Program Evaluation; Reading Programs; School Integration; Teacher Education
IDENTIFIERS	*Elementary Secondary Education Title I; ESEA Title I; Follow Through Program; Right To Read Program

ABSTRACT

This report, the eighth annual report of the National Advisory Council on the Education of Disadvantaged Children (NACEDC), is presented as a commentary on the previous year's administration of the programs for disadvantaged children, with recommendations for the future. NACEDC notes that 1.5 million fewer disadvantaged children are now being served due to the concentration guideline directing spending on fewer for maximum impact; at the same time it is known that the number of children living in school attendance areas with high concentrations of children from low income families is about 20 million--suggesting that about two-thirds needing Title I services are not receiving them. Recommendations in the report relate to State funds for compensatory education, Title I audits and enforcement, delivery of services, legislative proposals for State Advisory Council for Title I, parent involvement, desegregation, nonpublic school children, follow through programs proposed by the Division of Compensatory Education, migrant programs, neglected and delinquent children in State institutions, the Right to Read Program, and teacher training. In light of appeals by private school administrators and practitioners, a special section of the report is devoted to the special needs of private schools serving disadvantaged children. (RJ)

Statutory obligation:

(b) The National Council shall review and evaluate the administration and operation of this title, including its effectiveness in improving the educational attainment of educationally deprived children, including the effectiveness of programs to meet their occupational and career needs, and make recommendations for the improvement of this title and its administration and operation. These recommendations shall take into consideration experience gained under this and other Federal educational programs for disadvantaged children and, to the extent appropriate, experience gained under other public and private educational programs for disadvantaged children.

Review and evaluation.

(c) The National Council shall make such reports of its activities, findings, and recommendations (including recommendations for changes in the provisions of this title) as it may deem appropriate and shall make an annual report to the President and the Congress not later than March 31 of each calendar year. Such annual report shall include a report specifically on which of the various compensatory education programs funded in whole or in part under the provisions of this title, and of other public and private educational programs for educationally deprived children, hold the highest promise for raising the educational attainment of these educationally deprived children. The President is requested to transmit to the Congress such comments and recommendations as he may have with respect to such report.

Annual report to President and Congress.

ESEA title I, section 134 (b) and (c)
(Public Law 91-230)

ED 065649

DHEW Publication No. (OE) 72-121

THE 1972 ANNUAL REPORT
TO THE PRESIDENT AND THE CONGRESS

Educating the Disadvantaged Child: Where We Stand

U.S. DEPARTMENT OF HEALTH,
EDUCATION & WELFARE
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Superintendent of Documents Catalog No. HE 5.237.37043-72

U.S. GOVERNMENT PRINTING OFFICE

WASHINGTON: 1972

For sale by the Superintendent of Documents, U.S. Government Printing Office
Washington, D.C. 20402 - Price 50 cents

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March 31, 1972

Dear Sirs:

On behalf of the National Advisory Council on the Education of Disadvantaged Children, I am pleased to transmit to you the 1972 Annual Report of the Council. This is the eighth report to the President and the Congress since the creation of the Council in 1965.

In the current report, the Council analyzes some of the major changes which are taking place in title I of the Elementary and Secondary Education Act.

New regulations, new administrative tools, and new approaches have characterized the Federal role in the administration of title I. The Council has emphasized the States' role and participation of this program, discussing the increased review of that role by Federal officials.

Private school administrators and practitioners appealed to the Council for assistance in bringing their point of view before you. We have responded to this appeal by studying the issue carefully, and have devoted a special section within this annual report to the special needs of private schools serving educationally disadvantaged children.

Desegregation plans have in many cases dispersed the concentrated populations of children from low-income families, so that implementation of title I is made considerably more difficult. The Council has studied this, and included special comments regarding the U.S. Office of Education response to this issue.

The Council notes that title I is now serving 7.5 million disadvantaged children, 1.5 million fewer than in 1969. This decrease is due to the concentration guideline, which directs Local Education Agencies (LEA's) to spend more on fewer children for maximum impact.

The most recent study which records the number of children living in school attendance areas with high concentrations of children from low-income families (the determining factor of eligibility for title I service) states that *20 million children* are living in these attendance areas.*

This would suggest that approximately two-thirds of the children needing the extra services of compensatory education are not receiving title I services. The Council asks that you carefully consider this fact, and that neither the Executive nor the Legislative Branch of the Federal Government view with complacency the need to serve additional disadvantaged children.

Finally, it should be noted that this report was prepared by two groups of Council members, those appointed by the President to serve after that date. The NACEDC was reappointed under Public Law 91-230, which strengthened the Council by increasing the membership to 15, and requiring specific staggered terms.

Twenty-one men and women have reviewed these issues and performed dedicated services to you and the many millions of disadvantaged children. I have been pleased to serve with them, and know that they have been genuinely grateful for the opportunity to work for you at this highest level.

*1970 Belmont Study, CPIR, completed by the USOE Office of Planning and Evaluation, and analysis completed by Applied Data Research, Inc., October 1971.

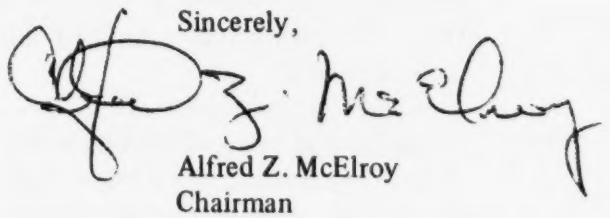
The Council is composed of 15 men and women with diverse backgrounds: One-third are women, one-half are professors of sociology or education, several are elementary and secondary school administrators, one is a juvenile court judge, two carry the experience of working in the private schools, and all are dedicated and committed to the improvement of opportunity for disadvantaged children.

The Council appreciates the assistance and participation of parents, teachers, local school administrators, parent advisory council members, title I administrators, and Federal officials in the preparation of this report.

We hope that you find it useful and stimulating as you prepare to grapple with the priorities of the Nation. We urge you to keep in mind the great need we all have to see these children succeed in the mainstream of American life.

With kindest personal regards, I am

Sincerely,



Alfred Z. McElroy
Chairman

The President
The White House

Honorable Spiro T. Agnew
President of the Senate

Honorable Carl B. Albert
Speaker of the House of Representatives

Enclosure

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OVERVIEW

The Federal role in the administration of title I of the Elementary and Secondary Education Act (ESEA), while not yet at the most effective level, has improved significantly since the 1971 Annual Report of the NACEDC. The Council criticized the U.S. Office of Education for lack of sufficient Federal review of the implementation of title I programs. That report also contained criticism of a seeming lack of enforcement of the provisions of ESEA and its pursuant regulations.

As a result of improvement at the Federal level, information now available concerning performance of State departments of education points to the need for comment about State administration of title I ESEA. As yet, there are insufficient data on local education agency (LEA) performance, and consequently only scattered comments can be made about this level of administration.

On the Federal level there have been several "firsts" for the administration of title I:

1. The U.S. Commissioner of Education has requested that $24,491,184 be returned to the U.S. Treasury from the title I allocations of 31 States following discovery of audit exceptions by the DHEW Audit Agency. More money will be requested as the audits are completed State by State.
2. For the first time, every State has been visited by Federal teams to provide technical assistance to the State administrators of title I programs in each of these States.
3. Comparability reports are being requested for the first time, as USOE begins to administer the new comparability regulations which became effective on October 14, 1971.[1]
4. The Interstate Uniform Migrant Student Record Transfer System has been expanded, from the successful pilot program in six States last year, to serve all 48 States which have migrant programs this year. The cost of the Record Transfer System was $3,100,000 in fiscal year 1971. The operating cost for fiscal year 1972 is $1,900,000.

   For the first time, education, health, and family information is available to any teacher within 4 hours of a telephone call to the State department of education terminal nearest the school site. Each State department has agreed upon a common form with other State departments, so that by a single phone call to a computer bank, vital information can be retrieved on the achievement level, textbooks used, immunization record, and other significant data about a student in the migrant stream. This Record Transfer System provides answers to two previously unavailable data needs: (1) How many migrant children are there? and (2) What services will best equip them to live a reasonable life?
5. Parent advisory councils (PAC's) have been mandated at the school district level by new regulations issued by Secretary of Health, Education, and Welfare Elliot Richardson, which became effective on October 14, 1971.
6. The Follow Through program will be modified considerably during 1972-75, based on information received from the Stanford Research Institute longitudinal study of Follow Through and financial considerations.
7. Early in 1971, U.S. Commissioner of Education Sidney P. Marland, Jr., a previous Council member, directed that all USOE programs focus upon the disadvantaged.

   At the November 1971 Council meeting the Commissioner reported his new position to the Council, and explained that this would be the first time that so many resources have been concentrated on the disadvantaged.
8. The USOE Division of Compensatory Education (DCE) this year has begun to issue handbooks on the basic operations of title I for LEA use (i.e., *Selection of Target Areas* and *The Private Schools*).

All of these firsts will be discussed at length in the report, giving the Congress and the President the Council's view and analysis of the current operation of title I ESEA.

Finally, the NACEDC requests Congress to take note of the latest development in Federal title I

[1] "Comparability" is an Office of Education term which results from legislation passed on April 13, 1970–Public Law 91-230. Comparability requires that all students in a school district receive the same services from sources other than title I, resulting in the same per pupil expenditure for every child, after which title I monies are added as an "extra" for compensatory services only. This further emphasizes another Congressional phrase in the original legislation, which states that title I monies must *supplement*, and not *supplant*, local funds and services. Title I funds are designed to compensate a child for educational disadvantage, and comparability regulations seek to guarantee that they are so used.

administration—the encouragement of a "component approach" to serve disadvantaged children. The U.S. Office of Education is encouraging the use of the experience gained for a multifaceted approach to conquering the educational disadvantage of poor children. It is not that innovation is being repressed, it is just that it is not being encouraged at this time.

Title I is being held accountable to the taxpayer, and thus the same tests and norms available prior to its enactment are being used to measure the success of the program.

The title I program is seeking to become more accountable to its constituencies. Educators know a little more about educating disadvantaged children, but they are often perplexed by the task of overcoming so much with so few resources.

Therefore, the NACEDC presents this report as a commentary on the past year's administration of the programs for disadvantaged children, with recommendations for the future.

SUMMARY OF RECOMMENDATIONS

State Funds for Compensatory Education

The NACEDC recommends that additional States contribute State funds to improve the education of educationally disadvantaged children.

The NACEDC recommends that the Division of Compensatory Education give priority to those 13 States with special incentive grants for providing State-funded compensatory education programs.

The NACEDC recommends that States be encouraged to spend State funds for compensatory education programs by not counting those State funds in comparability data.

Title I Audits and Enforcement

The NACEDC supports the U.S. Commissioner of Education's effort to enforce the title I regulations, as long as title I-eligible children are not victims of the enforcement.

Therefore, the NACEDC recommends that the States be required to spend from their own funds an amount equivalent to the audit exception, on title I–eligible children according to title I regulations, in the LEA's where the questionable expenditures occurred.

Delivery of Services

The NACEDC recommends that Congress review the State administration formula of 1 percent of the State title I allotment, and consider improving that ratio.

The NACEDC recommends that DCE demonstrate, through dissemination of exemplary projects during fiscal years 1972 and 1973, that the experience gained in administering title I justifies the stabilization of the program.

The NACEDC requests that USOE's Office of Program Planning and Evaluation and National Center for Educational Statistics provide us and other title I consumers with recent evaluative data on the successes in title I and on how this information is being disseminated for replication to the 16,000 participating school districts.

The NACEDC recommends that the States prepare careful evaluations of current title I programs and use the data collected therein for project approval and encouragement.

The NACEDC further recommends that the States develop evaluation procedures to ascertain what cognitive, affective, psychomotor, and supportive services are best able to compensate for title I–eligible children's educational deprivation.

The NACEDC recommends that SEA's monitor each LEA at least once a year.

The NACEDC welcomes the beginning of program reviews in each State by USOE, and recommends that USOE retrieve useful data from these reviews as well as provide technical assistance to the States.

The NACEDC further recommends that SEA's seek to package the titles of ESEA so that a strong attack is made on educational disadvantage. The NACEDC recommends that SEA's use titles I, II, III, and VII of ESEA and the Education Professions Development Act (EDPA) in a singleminded strategy of conquering educational disadvantage.

Legislative Proposal for State Advisory Council for Title I: Establishment and Certification

(a) Each State desiring to receive payments under title I of the act and the regulations for this part for any fiscal year shall establish a State advisory council of not more than 21 members which is appointed by the Governor and is broadly representative and proportionate of the cultural and educational resources of the State and of the public, including persons representative of
  (1) elementary and secondary schools
  (2) institutions of higher education
  (3) areas of professional competence in dealing with children needing special education because of physical or mental handicaps
  (4) areas of professional competence in guidance, counseling, and testing
  (5) elected members of mandated parent advisory councils for title I who are representatives of parents of children from low-income families
  (6) private school administrators and persons knowledgeable about private schools' title I programs
  (7) persons knowledgeable regarding migrant programs throughout the State
  (8) persons of special or professional competence in dealing with children in institutions or neglected and delinquent children
  (9) the general public.

(b) The Chief State School Officer and members of the SEA shall be ineligible to serve on the State advisory council either as chairman or as a voting member.
(c) The SEA shall certify the establishment of and the membership of its State advisory council to the U.S. Commissioner of Education at least 90 days prior to the beginning of any fiscal year in which the State desires to receive its title I entitlement. The certification shall include the name, education, experience, and current position of each person serving on the State advisory council and shall specify which interest under paragraph (a) of this section each person represents.

Functions

(a) The functions of the State advisory council shall include:
  (1) Advising the State education agency on the preparation of and policy matters arising in the administration of the State priorities and plan, and in the development of the policies and procedures required by these regulations, including educational priorities resulting from State evaluations of title I programs.
  (2) Preparing and submitting an annual report to the Governor, copies of which may be sent to the Chief State School Officer, the State Legislature, the NACEDC, and the U.S. Commissioner of Education regarding operation of the title I program in the State.
(b) The State advisory council shall meet and select a chairman from its membership within 30 days after certification has been accepted by the U.S. Commissioner of Education, and shall meet at such other times throughout the year as may be necessary to fulfill its functions under paragraph (a) of this section. The time, place and manner of such meetings shall be determined by the Council.
(c) The SEA shall include in its title I administrative budget adequate funds for the State advisory council to obtain the services of such professional, technical, and clerical personnel as may be necessary to enable it to carry out its functions under paragraph (a) of this section, and to contract for such services as may be necessary to enable it to carry out its evaluation functions.

Parent Involvement

The NACEDC recommends that DCE and USOE's regional offices undertake a program of dissemination of simplified regulations to PAC's which are mandated now, and hold regional conferences with these PAC representatives discussing title I and its regulations.

The NACEDC recommends that title I materials be made available to the parent advisory councils in the format and language most easily understood by the entire community.

The NACEDC further recommends that PAC's be mandatory at the local school level, with representatives on the districtwide council which is already mandated.

The NACEDC recommends that to make parent advisory councils more effective and to guarantee better parent representation on the councils, the Office of Education declare to the States that local target title I school advisory councils be an essential part of the local education agency's title I application.

Although the NACEDC applauds all forms of parent participation, we prefer the formal structure of an advisory council for each target school building. In addition, we recommend that, in school districts above a given size—such critical size to be determined by the Division of Compensatory Education—there be a parent advisory group to the district. The membership of this district council should include delegates from each target area council.

The National Advisory Council on the Education of Disadvantaged Children recommends that

1. ESEA amendments or guidelines assure immediately mandatory parental involvement at the local school level.
2. Title I materials be made available to the parent advisory councils in the format and language most easily understood by the entire community.
3. DCE encourage the inservice training of parent advisory council members by providing special incentive grants through the States for exemplary projects which emphasize parent involvement and parent education.
4. Federal allotments to States for State administration provide for the development of locally oriented, simple, public information for parents.
5. Governing boards of school districts be encouraged to give full recognition to the advisory councils as legitimate *advisors* in the educational program, as required by law.
6. Roles and functions of advisory councils be clearly and jointly delineated by the members of the council and the school district.
7. The governing board of the school district communicate promptly to the members of the advisory council the results of their study of the recommendations made by the PAC.
8. PAC's verify that sufficient funds for secretarial services and other needed services have been applied for by the school district in its title I

proposal, and prior to submission of that section of the application, the PAC and the school district come to a common understanding of the budget the PAC will have.

9. When language is a barrier to communication, the school assign staff who are bilingual to assist both the council and the school district in understanding each other's point of view.

Desegregation

The Council recommends that a Federal guideline be issued so that the practice of separation from other students for the purposes of receiving undiluted title I services is not abused.

The NACEDC recommends that DCE adjust the wording in ESEA Title I Program Guide 64 referring to segregated private institutions. The NACEDC recommends the following wording:

> Title I services are not to be offered on the premises of any school established to evade desegregation or having admissions and curricular policies that systematically exclude minority children. This prohibition should not be construed in such a way as to deny services to title I–eligible children attending private schools, when these schools have substantial minority enrollments due to residence patterns, but lack the legal obligation and the legal remedies to meet ethnic ratios or other enrollment criteria fixed by court orders or other governmental directives.

Nonpublic School Children

In view of the wide disparity among States in this regard and resulting inequities in opportunity and participation by nonpublic school children, the Council recommends that section 143 of title I be amended to incorporate a "bypass" mechanism, similar to title III, ESEA, section 307 f (1-2).

> (f)(1) In any State which has a State plan approved under section 305(c) and in which no State agency is authorized by law to provide, or in which there is a substantial failure to provide, for effective participation on an equitable basis in programs authorized by this title by children enrolled in any one or more private elementary or secondary schools of such State in the area or areas served by such programs, the Commissioner shall arrange for the provision, on an equitable basis, of such programs and shall pay the costs thereof for any fiscal year out of that State's allotment. The Commissioner may arrange for such programs through contracts with institutions of higher education, or other competent nonprofit institutions or organizations.
>
> (2) In determining the amount to be withheld from any State's allotment for the provision of such programs, the Commissioner shall take into account the number of children and teachers in the area or areas served by such programs who are excluded from participation therein and who, except for such exclusion, might reasonably have been expected to participate.

The NACEDC recommends that all LEA's should, in their needs assessment, determine, according to the poverty formula and some other educational standard, the educationally disadvantaged children attending their nonpublic schools.

The NACEDC recommends further that these statistics on nonpublic school enrollments be applied to the determination of the title I application from the public school district, so that nonpublic school children receive an equitable share of services based upon the proportion of nonpublic school children to the total number of the eligible children in the district.

The NACEDC recommends that services to disadvantaged children enrolled in nonpublic schools should be provided in a manner and location most appropriate to the nature of the program and to the population to be served.

The NACEDC recommends that DCE issue a statement in these guidelines regarding the private schools, so that private schools will be included in the reranking of target attendance areas.

The NACEDC recommends that DCE discourage the practice of identifying private school participants by "matching" private schools with identified title I schools that are located in the same geographical area. Matching on a geographical-institutional basis would not always (perhaps rarely) successfully identify the highest concentration of eligible private school children. Given an adequate data base, the target nonpublic school sites can be identified in the same manner as the public school–by school attendance areas.

Follow Through Program

The NACEDC is interested in the Five Year Plan for Follow Through proposed by DCE, and would like DCE to demonstrate that an increase in services to disadvantaged children can really result from a cost reduction effort.

The NACEDC supports the move to encourage concentrating title I spending on the lower elementary grades, and to proliferate the positive experiences from Follow Through throughout title I projects.

Migrants

The NACEDC compliments the Migrant Programs Branch and DCE for implementing this system, and

recommends that USOE now accumulate data on how many migrant children are being served and their educational achievement with the data already collected.

Now that Phase I and II of the program have been implemented successfully, the NACEDC recommends that there be a Phase III, which will utilize this information for effective delivery of services to migrant children.

Neglected and Delinquent Children in State Institutions

The NACEDC suggests that a task force made up of Federal, State, and local administrators, law enforcement officers, and judges be established by June 30, 1972, to report by December 30, 1972, to DCE and the NACEDC on improving the expenditures of title I in this area, to effect maximum delivery of services and superior programs for these children.

The NACEDC requests that DCE evaluate carefully programs in these institutions and report exemplary projects to the Council by June 1972.

The NACEDC requests that DCE release by July 1, 1972, the handbook on this legislation, so that administrators of programs in State institutions for the neglected and delinquent have a better working and planning ability for the next fiscal year's expenditures.

The Right To Read

The NACEDC recommends that the Congress amend ESEA to target the $500 million in reading program money scattered throughout USOE to the Right To Read program.

In addition, the NACEDC recommends that there be separate legislation for the Right To Read program, and separate funding, so that the USOE focus on reading as a goal for the seventies can be effectively accomplished, and so that functional illiteracy can be erased in the next decade.

Teacher Training

The NACEDC recommends that teacher training include sufficient preservice and inservice courses to prepare all teachers for the future possibility of desegregation plans in the school district in which they find employment.

The NACEDC recommends that teachers who are employed in title I projects have backgrounds which sufficiently prepare them to work in this highly specialized field.

The NACEDC recommends that USOE undertake a data search to identify title I funds which are used for teacher training.

The NACEDC further recommends that DCE earmark any funds spent by other programs for teacher training in poverty-level schools, and provide this information to the Council.

The Council recommends that the following be set in motion:

(1) That every LEA be required to assess teacher needs for inservice training and, upon completion of assessment, make well-planned training programs part of the title I proposal.
(2) That such programs be evaluated and information on effective programs be disseminated.

DELIVERY OF SERVICES

1. Title I ESEA and the Federal Budget: A Comparison of Priorities

Title I appropriations have increased by $638 million since 1965. However, the total proportion of that amount to the Federal budget reflects a decrease in effort from .7 percent to .6 percent.

Support of title I increased from an appropriation of $959 million in fiscal year 1966 to $1.565 billion in fiscal year 1972. The President has requested $1.597 billion for fiscal year 1973. This represents a decrease in proportion, and with inflation of approximately 20 percent from 1966 added to that, the title I dollar is shrunk even more. Considering further that that education dollar shrinks most rapidly, since it must buy teacher salaries and construction of facilities, and these are the fastest rising costs, title I has suffered great attrition in appropriations over the years.

During the same period of time, due to lack of funds, and on the basis of evidence that demonstrates a minimum dollar amount which "makes a difference" for educationally deprived children, title I service has decreased from 9 million children to 7.5 million children. The last study completed in 1970 documents that there are 20 million children living in attendance areas with high concentrations of children from low-income families. Therefore, it is possible to estimate that title I is reaching approximately one-third of the population Congress intended it to serve.

Title I ESEA at the U.S. Office of Education

At the Office of Education, title I is the largest program in budget expenditures, with 27.2 percent of the total USOE budget. It serves the most children and receives the most funds.

With programs from other funding sources, in addition to title I, OE presently targets more than $2.3 billion to the disadvantaged. (Table 1, pp. 8-9)

State Spending for Compensatory Education

Thirteen States have compensatory education programs of their own. Table 2 (see p. 10) lists those States and the amounts they have been spending during the past 2 years.

The NACEDC recommends that additional States contribute State funds to improve the education of educationally disadvantaged children.

The NACEDC recommends that the Division of Compensatory Education give priority to those 13 States with special incentive grants for providing State-funded compensatory education programs.

The NACEDC recommends that States be encouraged to spend State funds for compensatory education programs by not counting those State funds in comparability data.

The Fiscal Year 1972 Program

Table 3 (see pp. 11-13) is a jurisdictional breakdown of title I expenditures by program.

The NACEDC recommends that Congress review the State administration formula of 1 percent of the State title I allotment, and consider improving that ratio.

The Council examination of the title I budget reflects serious concern that insufficient funds are being spent to accomplish a difficult task. It is certainly necessary to improve the quality of the spending for disadvantaged children and their education; however, it is of great concern to the Council that merely one-third of the eligible children are being served.

2. Title I Audit Exceptions

Title I is administered through a State department of education, according to the law which established the program. The Federal Government, after being assured by appropriate State officials, including the State Attorney General, that Federal regulations will be upheld, sends the entitled money to the SEA for distribution according to the law and guidelines. Therefore, the ultimate responsibility for the legal operation of title I programs and for the implementation of program rules rests with the State.

Since the beginning of title I, the DHEW Audit Agency has reviewed the title I administration of most SEA's, but no efforts toward enforcements have been made. These audits are done in cooperation with the U.S. Office of Education, and often a State is not visited more than once every 3 years. When audit exceptions are discovered, negotiations take place between the SEA and the Office of Education to determine the reason for the error or to justify spending funds in the disputed manner.

The NACEDC supports the Commissioner of Education's effort to enforce the title I regulations, as

Table 1. Programs for the disadvantaged administered by the U.S. Office of Education

Type of assistance	Authorization	Fiscal 1972 appropriation	Fiscal 1973 budget request	Administering division
Occupational training and retraining	Manpower Development and Training Act of 1962, as amended	$140,000,000	([1])	Division of Manpower Development and Training
Talent Search	Higher Education Act of 1965, title IV-A as amended by the Higher Education Amendments of 1968, title 1-A	5,000,000	$6,000,000	Division of Student Special Services
Upward Bound	Higher Education Amendments of 1968, title 1-A	32,669,000	38,331,000	Division of Student Special Services
Student special services	Higher Education Amendments of 1968, title 1-A	15,000,000	26,000,000	Division of Student Special Services
Follow Through	Economic Opportunity Act of 1964	60,060,000	57,700,000	Division of Compensatory Education
Programs for disadvantaged children, including neglected and delinquent children in local institutions	Elementary and Secondary Ed. Act, title I (amended by Public Law 89-750)	1,372,315,840	1,451,927,000	Division of Compensatory Education
Programs for children in State institutions for the neglected and delinquent	Elementary and Secondary Ed. Act, title 1 (amended by Public Law 89-750)	19,296,851	20,213,000	Division of Compensatory Education
Programs for migratory children	Elementary and Secondary Ed. Act, title 1 (amended by Public Law 89-750)	64,823,000	$64,823,000	Division of Compensatory Education
Programs for Indian children	Elementary and Secondary Ed. Act, title 1 (amended by Public Law 89-750)	12,094,000	12,477,000	DCE and Office of Special Concerns

[1] DCE figure not available by publication date.

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Table 1. Programs for the disadvantaged administered by the U.S. Office of Education—Continued

Type of assistance	Authorization	Fiscal 1972 appropriation	Fiscal 1973 budget request	Administering division
Bilingual education	Elementary and Secondary Ed. Act, title VII	34,880,000	41,130,000	Division of Plans and Supplementary Centers
Dropout prevention	Elementary and Secondary Ed. Act, title VIII	10,000,000	10,000,000	Division of Plans and Supplementary Centers
Adult education	Adult Education Act of 1966, as amended	61,134,000	51,300,000	Division of Adult Education Programs
Incentive grants	Elementary and Secondary Ed. Act, title 1 (amended by Public Law 91-230)	9,301,820	7,281,000	Division of Compensatory Education
Special grants to urban and rural school districts with high concentrations of poor children	Elementary and Secondary Ed. Act, title 1 (amended by Public Law 91-230)	25,192,500	24,804,000	Division of Compensatory Education

Table 2. State spending for compensatory education[1]

State	1970-71	1971-72	
California	$39,400,000	$39,400,000	
Colorado	1,547,000	1,000,000	
Connecticut	8,500,000	6,500,000	
Delaware	500,000	500,000	
Hawaii	1,592,544	1,655,065	
Michigan	16,500,000	23,000,000	
Nebraska	L.B.448: State Aid; in 20 districts, 1 pupil counts as 2.		
New York	62,740,000	52,090,000	
Ohio	22,254,431	28,745,142	33,337,400 projected
Pennsylvania	1,000,000	1,000,000	
Rhode Island	2,000,000	2,000,000	
Washington	5,141,240	2,975,710	
Wisconsin	844,685	842,045	
Total	162,019,900	159,707,962	

[1] From USOE statistics, February 1972.

long as title I-eligible children are not victims of the enforcement.

In September 1971, Dr. Sidney P. Marland, Jr., Commissioner of Education, requested that $5,586,603 be returned from six States and the District of Columbia to the U.S. Treasury. The amounts were as follows:

Arizona	$1,417,374
California	1,101,359
District of Columbia	1,560,787
Michigan	928,640
Pennsylvania	355,479
Washington	189,628
Wisconsin	33,336
Total:	$5,586,603

Through misunderstanding, it has been suggested that these six States and the District of Columbia were singled out for punitive action. That is not the case. The DHEW Audit Agency continues to audit every State at some time, and as exceptions come to light, corrective measures will now be taken by the Commissioner.

As many as 31 States have not been contacted for a total of $24,491,184 in misspent funds.

Alternative Measures

When funds are recalled, the Council takes note of the fact that title I-eligible children are losing their statutory entitlement twice over. They did not receive authorized services when the funds were misspent in the first place, and if the funds are recalled, the likelihood of their receiving these services during that year is doubtful.

An alternative is to continue to deal at the State level. Legally, the States have assured the Commissioner of Education that Federal regulations would be followed and monitoring would be done by the SEA.

Therefore, the NACEDC recommends that the States be required to spend from their own funds an amount equivalent to the audit exception, on title I-eligible children according to title I regulations, in the LEA's where the questionable expenditures occurred.

The Council suggests that this is a better alternative, since title I-eligible children will be served in the "year of compliance."

Whether the LEA's must return funds to the State, or the State should be responsible for the amount, is an issue to be resolved at the SEA level. Only the SEA knows whether or not an application was filed in bad faith, or a proposal was known to be in violation preceding State approval. However, it is necessary to remember that the States have the final approval or denial of applications for title I entitlements. Any State may and should deny an LEA application with proposals to misuse monies.

A clear case of misused monies would be a project which was determined to be in violation of the law, which had not been included in the title I application, and which the State did not have an opportunity to review in advance.

The enforcement of title I regulations has raised considerable controversy among the States with discovered audit exceptions. Reasons for the misused monies have not always been clear-cut, and these

Table 3. Title I ESEA assistance for educationally deprived children, allotments to States, D.C., and outlying areas for fiscal year 1972

	Local education agencies	Handicapped children (State agencies)	Juvenile delinquents in institutions (State agencies)	Dependent and neglected children in institutions (State agencies)	Migratory children (State agency)	State administration	Total
Total	$1,406,513,617	$56,380,937	$18,044,820	$2,167,846	[1] $64,822,926	$17,307,696	$1,565,237,842
50 States and D.C.	$1,364,707,215	$55,978,666	$17,705,057	$2,167,846	[1] $64,822,926	$16,935,605	$1,522,317,315
Alabama	40,257,134	560,648	279,173	-	589,025	416,860	42,102,840
Alaska	2,054,974	-	77,447	-	-	150,000	2,282,421
Arizona	8,648,415	373,893	286,460	-	1,742,533	150,000	11,201,301
Arkansas	24,214,456	906,163	232,005	-	622,388	259,750	26,234,762
California	122,028,439	1,477,445	1,847,592	-	8,541,235	1,338,947	135,233,658
Colorado	10,100,532	1,146,605	153,775	30,678	1,261,649	150,000	12,843,239
Connecticut	11,813,005	1,220,152	122,610	44,835	589,260	150,000	13,939,862
Delaware	2,242,296	577,485	102,083	-	254,785	150,000	3,326,649
Florida	26,445,029	1,322,239	470,913	-	9,231,131	374,693	37,844,005
Georgia	39,947,788	474,365	401,887	-	445,220	412,693	41,681,953
Hawaii	3,250,669	212,443	19,572	6,116	-	150,000	3,638,800
Idaho	2,730,118	137,286	77,079	-	753,155	150,000	3,847,638
Illinois	63,243,090	3,065,108	921,814	129,870	623,025	679,829	68,662,736
Indiana	16,999,801	1,766,309	310,619	154,159	604,364	198,353	20,033,605
Iowa	15,464,659	634,115	120,127	113,826	84,286	164,170	16,581,183
Kansas	10,427,273	866,665	126,165	-	535,338	150,000	12,105,441
Kentucky	37,131,906	455,958	45,634	-	73,628	377,071	38,084,197
Louisiana	34,683,312	1,344,864	375,810	-	404,571	368,086	37,176,643
Maine	5,607,754	452,890	114,277	-	53,687	150,000	6,378,608
Maryland	19,423,141	589,707	507,148	-	510,643	210,306	21,240,945

[1] $1,900,000 of this amount reserved for the Migrant Student Record Transfer System.

Table 3. Title I ESEA assistance for educationally deprived children, allotments to States, D.C., and outlying areas for fiscal year 1972 – Continued

	Local education agencies	Handicapped children (State agencies)	Juvenile delinquents in institutions (State agencies)	Dependent and neglected children in institutions (State agencies)	Migratory children (State agency)	State administration	Total
Massachusetts	23,858,101	2,504,434	244,833	-	245,225	268,526	27,121,119
Michigan	47,708,517	2,841,841	501,373	9,633	3,588,427	546,498	55,196,289
Minnesota	21,120,043	890,344	325,834	-	372,318	227,085	22,935,624
Mississippi	42,074,152	302,182	229,321	-	861,680	434,673	43,902,008
Missouri	25,579,100	1,602,563	359,321	-	385,014	279,260	28,205,258
Montana	3,013,338	202,861	85,516	42,950	722,476	150,000	4,217,141
Nebraska	7,523,056	289,527	101,239	34,897	239,675	150,000	8,338,394
Nevada	883,771	115,044	92,802	-	32,212	150,000	1,273,829
New Hampshire	1,908,409	243,510	71,711	-	19,941	150,000	2,393,571
New Jersey	44,860,594	3,340,931	602,577	-	1,830,525	506,346	51,140,973
New Mexico	9,629,504	298,731	105,457	-	842,122	150,000	11,025,814
New York	193,459,929	7,253,392	1,849,722	22,774	2,403,247	2,049,891	207,038,955
North Carolina	56,260,988	1,870,999	819,113	-	1,280,056	602,312	60,833,468
North Dakota	4,271,181	312,536	51,770	-	631,592	150,000	5,417,079
Ohio	41,269,978	638,494	851,709	129,616	1,255,897	441,457	44,587,151
Oklahoma	18,199,914	497,757	144,188	141,888	640,412	196,242	19,820,401
Oregon	9,382,231	854,152	239,617	-	1,641,090	150,000	12,267,090
Pennsylvania	67,113,702	4,575,784	769,672	219,608	514,091	731,929	73,924,786
Rhode Island	5,189,238	402,390	20,120	81,372	2,683	150,000	5,845,803
South Carolina	34,313,120	824,482	264,218	61,357	533,421	359,966	36,356,564
South Dakota	6,266,048	190,973	44,484	-	31,062	150,000	6,682,567
Tennessee	36,288,395	633,892	461,326	233,156	266,902	378,837	38,262,508
Texas	69,566,731	2,243,741	821,414	475,132	16,094,656	892,017	90,093,691
Utah	3,593,198	317,521	100,472	-	218,584	150,000	4,379,775
Vermont	2,107,682	291,828	65,959	-	5,369	150,000	2,620,838

Table 3. Title I ESEA assistance for educationally deprived children, allotments to States, D.C., and outlying areas for fiscal year 1972 – Continued

	Local education agencies	Handicapped children (State agencies)	Juvenile delinquents in institutions (State agencies)	Dependent and neglected children in institutions (State agencies)	Migratory children (State agency)	State administration	Total
Virginia	33,803,541	735,515	585,574	-	645,013	357,696	36,127,339
Washington	12,255,022	1,287,421	419,218	-	1,833,149	157,948	15,952,758
West Virginia	20,524,496	379,645	187,905	23,009	165,663	212,807	21,493,525
Wisconsin	16,546,374	1,730,025	381,517	39,174	438,574	191,357	19,327,021
Wyoming	1,235,793	167,297	61,549	33,459	161,927	150,000	1,810,025
Dist. of Columbia	8,187,278	554,514	253,336	140,337	-	150,000	9,285,465
American Samoa	333,046	-	-	-	-	25,000	358,046
Guam	902,004	43,717	-	-	-	25,000	970,721
Puerto Rico	26,521,556	358,554	329,026	-	-	272,091	27,481,227
Trust Territory	1,049,404	-	-	-	-	25,000	1,074,404
Virgin Islands	523,392	-	10,737	-	-	25,000	559,129
Dept. of Interior Bureau of Indian Affairs	12,477,000	-	-	-	-	-	12,477,000

misunderstandings are being resolved through continued negotiations. However, for the $1.5 billion flow of services to the disadvantaged child to have impact, it is mandatory that the U.S. Office of Education take steps when the law has been violated.

3. National Program Review of Title I ESEA, Fiscal Year 1972

The National Program Review of Title I ESEA is taken from data supplied by USOE as a result of DCE area teams' visiting every State in fiscal year 1971. These data indicate that State administration of title I is improving, but that States need further development of their role as the central administrator of title I.

Without evaluating any individual State's title I programs' effectiveness, the Council would like to indicate the degree of the State's role as custodian of title I funds.

Last year's report of the Council criticized the serious lack of sufficient fiscal audits and program reviews from the Federal level during 1965-1970. Finally, DCE has reviewed every State in fiscal year 1971, and 11 States in fiscal year 1972. Technical assistance has been provided, goals have been established, and a State-by-State assessment has been made.

The 1971 results demonstrate that USOE is moving into a position where it has greater control of its title I objectives than in early years of administering the title. Innovation still exists on a small scale, but overall, it is demonstrated that title I has become an identifiable, readily implemented prescription for educationally deprived children. Certain components are almost always a part of the LEA proposal, such as reading; cultural enrichment; inservice training; and nutritional, health, and psychological services.

The small research and development feature of the national title I program is being reduced, and the emphasis is being placed on implementation of the experience gained between 1966 and the present. The Follow Through program, once a generous national research and development laboratory for grades K-3, intended to capitalize on gains made in Project Head Start, is gradually being phased out as an innovative tool. Positive experience from the Follow Through program will be disseminated throughout title I so that it can be expanded to help more children with fewer Federal outlays per child. The Council will discuss Follow Through in another section of the report.

If USOE can recommend now with certainty the formula which does compensate disadvantaged children for their educational deprivation, this stabilization of the title I program, based upon 6½ years of funding, holds promise. The NACEDC is not satisfied that a formula is available at this time, and will continue to examine closely the new component approach to educating disadvantaged children.

The NACEDC recommends that DCE demonstrate, through dissemination of exemplary projects during fiscal years 1972 and 1973, that the experience gained in administering title I justifies the stabilization of the program.

The NACEDC requests that USOE's Office of Program Planning and Evaluation and National Center for Educational Statistics provide us and other title I consumers with recent evaluative data on the successes in title I and on how this information is being disseminated for replication to the 16,000 participating school districts.

The DCE Program Reviews and Council Comment

The area desk for each USOE region in the Division of Compensatory Education has made a thorough review of the implementation of title I State by State. This information has been provided to the Council, and after careful study, the Council makes the following report.

USOE program reviews focus on three elements of concern:

1. SEA management of the State program
2. SEA management of LEA projects, applications, and program
3. SEA compliance with effective regulations and guidelines, i.e., private schools, comparability, dissemination, and parent involvement.

SEA Management of the State Program and LEA Projects

In 1971 States were on the threshold of improving the administration of title I. Generally, States have identified priority needs to the LEA's for project planning; however, these needs have not been developed with the assistance of evaluations or statistical research. The NACEDC recommends that the States prepare careful evaluations of current title I programs and use the data collected therein for project approval and encouragement.

The NACEDC further recommends that the States develop evaluation procedures to ascertain what cognitive, affective, psychomotor, and supportive services are best able to compensate for title I-eligible children's educational deprivation.

The States need to demonstrate leadership in LEA project planning and to provide up-to-date information on exemplary projects which can have possibilities of replication throughout the State.

With better internal management, States can improve their role. DCE reviews have demonstrated that there is little or no staff development for State title I staffs throughout the country, that there is little coordination among title I staffs and other

compensatory education activities within the States, and that the application approval stage is lacking in program objectives.

This results in annual reports from States which indicate that they do not follow up on misspent funds or unsuccessful programs. No States package title I with other titles of ESEA for maximum impact. Forty States do not monitor each LEA at least once a year.

The NACEDC recommends that SEA's monitor each LEA at least once a year.

The NACEDC further recommends that SEA's seek to package the titles of ESEA so that a strong attack is made on educational disadvantage. The NACEDC recommends that SEA's use titles I, II, III, and VII of ESEA and the Education Professions Development Act in a singleminded strategy of conquering educational disadvantage.

To accomplish these goals, the States need assistance in developing a systematic approaches to data collection, evaluation, and fiscal management.

The Regulations

Private Schools.—Title I delivery of services to private school children has not been effectively administered by SEA officials. States are approving applications which appear on the surface to be in compliance, and have monitored these projects on a very scattered basis. There are indications, which are known to USOE, that some States, in defiance of assurances made to the U.S. Commissioner by the State Attorney General, have retreated behind State laws to deny participation to private school children.

NACEDC recommends that USOE reaffirm the commitments each State has made to the U.S. Commissioner of Education, and that the regulations which apply to eligible children enrolled in private schools be fully enforced.

Comparability.—Comparability is a new regulation about which States have been advised for well over a year. Comparability requires that all sources of monies which result in the total per pupil expenditure before title I funds are added be equalized in the school district, so that each student receives the same per pupil expenditure. Only after this has been accomplished can title I funds be added for title I—eligible children, to contribute effectively to a true compensatory education program.

This concept is an extension of the early regulations, which state that title I monies are to "supplement and not supplant" local expenditures. Simply stated, this means that title I is designed to be "something extra" for educationally disadvantaged children.

The States have generally informed the LEA's about comparability requirements, and need now to provide assistance for LEA's to accomplish this goal uniformly throughout each State.

Parent Involvement.[1]—Regulations governing parent involvement are now effective. There must be a parent advisory council (PAC) on the school district level for parents of title I—eligible children. Information must be readily provided to PAC members, and the most pertinent documents (i.e., the title I application) must be provided to parents free of charge.

In fiscal year 1971 the States, on the average, approved only those applications on which appeared a statement from the PAC regarding the PAC position. However, PAC's need strong support from the State level in application approval, compliance enforcement, technical assistance, and coordination with community services.

The NACEDC recommends that parent involvement be expanded to the local school level, and that a parent advisory council be established for each target school. The Council suggests that the membership of the districtwide council reflect representation of these local school PAC's and that parents be encouraged to be members of these groups.

Fiscal Year 1972

The NACEDC has been encouraged by the State-by-State reviews conducted in fiscal year 1971 and would like to see a continuation of this management practice by USOE. However, due to budget considerations, the Federal staff cutback, and other reasons, only 14 States have been reviewed so far in the first 8 months of fiscal year 1972.

The NACEDC considers the program review technique of USOE to be a valuable management tool for both the USOE and the SEA. However, the Council has found it difficult to locate data, and DCE has not been able to provide this data, on pertinent items contained in State evaluation reports. Figures to answer such questions as "How many Indians are served with title I funds?" or "How many title I—eligible children are there?" or "What percentage of title I dollars is being spent for reading, teacher training, etc.?" have been repeatedly requested by this Council. States should be able to provide this information and DCE should have it available.

The NACEDC welcomes the beginning of program reviews in each State by USOE, and recommends that USOE retrieve useful data from these reviews as well as provide technical assistance to the States.

4. State Advisory Councils for Title I

While reviewing programs for the disadvantaged child during the past year, several subcommittees independently arrived at the common conclusion that State advisory councils for title I would contribute a

[1] See also chapter on Parent Involvement.

great deal to the effective administration of the program. The conclusion was based upon the common premise that it is important for the decision-makers, the application approvers, and the data disseminators to have input from the practitioners and consumers of title I services.

Since for title I the legal and administrative responsibility is at the State level, and since encouragement by the current Presidential Administration for State-based programs is strong, the NACEDC recommends that there be established State advisory councils for title I.

The suggested format for the State advisory council for title I would be patterned after existing State councils, and a legislative proposal follows. However, the NACEDC wishes to emphasize that it does not wish to establish a parallel bureaucracy at the State level to the State departments of education.

Legislative Proposal for State Advisory Council for Title I: Establishment and Certification

(a) Each State desiring to receive payments under title I of the act and the regulations for this part for any fiscal year shall establish a state advisory council of not more than 21 members which is appointed by the Governor and is broadly representative and proportionate of the cultural and educational resources of the State and of the public, including persons representative of
  (1) elementary and secondary schools
  (2) institutions of higher education
  (3) areas of professional competence in dealing with children needing special education because of physical or mental handicaps
  (4) areas of professional competence in guidance, counseling, and testing
  (5) elected members of mandated parent advisory councils for title I who are representatives of parents of children from low-income families
  (6) private school administrators and persons knowledgeable about private schools' title I programs
  (7) persons knowledgeable regarding migrant programs throughout the State
  (8) persons of special or professional competence in dealing with children in neglected and delinquent institutions
  (9) the general public.

(b) The Chief State School Officer and members of the SEA shall be ineligible to serve on the State advisory council either as chairman or as a voting member.

(c) The SEA shall certify the establishment of and the membership of its State advisory council to the U.S. Commissioner of Education at least 90 days prior to the beginning of any fiscal year in which the State desires to receive its title I entitlement. The certification shall include the name, education, experience, and current position of each person serving on the State advisory council and shall specify which interest under paragraph (a) of this section each person represents.

Functions

(a) The functions of the State advisory council shall include:
  (1) Advising the State education agency on the preparation of and policy matters arising in the administration of the State priorities and plan, and in the development of the policies and procedures required by these regulations, including educational priorities resulting from State evaluations of title I programs.
  (2) Preparing and submitting an annual report to the Governor, copies of which may be sent to the Chief State School Officer, the State Legislature, the NACEDC, and the U.S. Commissioner of Education regarding the operation of the title I program in the State.

(b) The State advisory council shall meet and select a chairman from its membership within 30 days after certification has been accepted by the U.S. Commissioner of Education, and shall meet at such other times throughout the year as may be necessary to fulfill its functions under paragraph (a) of this section. The time and place and manner of such meetings shall be determined by the Council.

(c) The SEA shall include in its title I administrative budget adequate funds for the State advisory council to obtain the services of such professional, technical, and clerical personnel as may be necessary to enable it to carry out its functions under paragraph (a) of this section, and to contract for such services as may be necessary to enable it to carry out its evaluation functions.

5. New Federal Regulations, Title I ESEA, 1971

Public Law 91-230, passed on April 13, 1970, legislated changes in policies regarding public information, bonus pay, parent involvement, and comparability to which the USOE was to respond with new regulations.

Eighteen months later, the regulations were finally accepted, and they appeared in final form in the *Federal Register* on October 14, 1971.

Public Information

It is now law that each school district must provide to the general public information concerning the provisions of title I, the applicant's past and present title I programs, and evaluation of those programs. The LEA must also provide upon request the full text of title I applications and all pertinent documents regarding those applications. The full regulation appears below:

(n) Each application by a local educational agency for a grant under title I of the Act shall include specific plans for disseminating information concerning the provisions of title I, and the applicant's past and present title I programs, including evaluations of such programs, to parents and to the general public and for making available to them upon request the full text of current and past title I applications, all pertinent documents related to those applications, evaluations of the applicant's past title I projects, all reports required by §116.23 to be submitted to the State educational agency, and such other documents as may be reasonably necessary to meet the needs of such parents or other members of the public for information related to the comprehensive planning, operation, and evaluation of the title I program but not including information relating to the performance of identified children and teachers. Such plans shall include provision for the reproduction, upon request, of such documents free of charge or at reasonable cost (not to exceed the additional costs incurred which are not covered by title I funds) or provisions whereby persons requesting such copies will be given adequate opportunity to arrange for the reproduction of such documents.

(20 U.S.C. 214e, 1231d)

The NACEDC feels that the public information regulation will insure that parents of title I children have all pertinent documents made available to them upon request.

Parental Involvement

Parent advisory councils on the school district level are now required by law. After the Commissioner of Education determined that this depth of parent involvement would contribute positively to the effectiveness of the title I program, a regulation was developed to accomplish this involvement.

The regulation appears below:

(o) (1) Parental involvement at the local level is deemed to be an important means of increasing the effectiveness of programs under title I of the Act. Each application of a local educational agency (other than a State agency directly responsible for providing free public education for handicapped children or for children in institutions for neglected and delinquent children) for assistance under that title, therefore, (i) shall describe how parents of the children to be served were consulted and involved in the planning of the project and (ii) shall set forth specific plans for continuing the involvement of such parents in the further planning and in the development and operation of the project.

(2) Each local educational agency shall, prior to the submission of an application for fiscal year 1972 and any succeeding fiscal year, establish a council in which parents (not employed by the local educational agency) of educationally deprived children residing in attendance areas which are to be served by the project, constitute more than a simple majority, or designate for that purpose an existing organized group in which such parents will constitute more than a simple majority, and shall include in its application sufficient information to enable the State educational agency to make the following determinations:

(i) That the local educational agency has taken appropriate measures to insure the selection of parents to the parent council who are representative (*a*) of the children eligible to be served (including such children enrolled in private schools) and (*b*) of the attendance areas to be included in the title I program of such agency;

(ii) That each member of the council has been furnished free of charge copies of title I of the Act, the Federal regulations, guidelines, and criteria issued pursuant thereto, State title I regulations and guidelines, and the local educational agency's current application; and that such other information as may be needed for the effective involvement of the council in the planning, development, operation, and evaluation of projects under said title I (including prior applications for title I projects and evaluations thereof) will also be made available to the council;

(iii) That the local educational agency has provided the parent council with the agency's plans for future title I projects and programs, together with a description of the process of planning and developing those projects and programs, and the projected times at which each stage of the process will start and be completed;

(iv) That the parent council has had an adequate opportunity to consider the information available concerning the special educational needs of the educationally deprived children residing in the project areas, and the various programs available to meet those needs, and to make recommendations concerning those needs which should be addressed through the title I program and similar programs;

(v) That the parent council has had an opportunity to review evaluations of prior title I programs and has been informed of the performance criteria by which the proposed program is to be evaluated;

(vi) That the title I program in each project area includes specific provisions for informing and consulting with parents concerning the services to be provided for their children under title I of the Act and the ways in which such parents can assist their children in realizing the benefits those services are intended to provide;

(vii) That the local educational agency has adequate procedures to insure prompt response to complaints and suggestions from parents and parent council;

(viii) That all parents of children to be served have had an opportunity to present their views concerning the application to the appropriate school personnel, and that the parent council has had an opportunity to submit comments to the State educational agency concerning the application at the time it is submitted, which comments the State educational agency shall consider in determining whether or not the application shall be approved.

(3) The State educational agency may establish such additional rules and procedures, not inconsistent with the provisions of this section, as may be reasonably necessary to insure the involvement of parents and the proper organization and functioning of parent councils.

(20 U.S.C. 1231d)

The Council supports these steps which the Commissioner has taken to encourage parent involvement in title I and makes the following two recommendations:

The NACEDC recommends that, where appropriate, title I materials be made available to the parent advisory councils in the easiest language understood by the community.

The NACEDC further recommends that PAC's be mandatory at the local school level, with representatives on the districtwide council which is already mandated.

Bonus Pay for Teachers

Although it is possible for LEA's to pay teachers a financial bonus out of title I funds to attract them to serve in title I schools, there are sufficient safeguards in the regulation to permit the NACEDC to support it as it now stands.

The full regulation (section 116.17) appears below:

> (p) An application for a grant for a project under title I of the Act may include, as a part of the applicant's program, provision for the payment of bonuses to teachers in a limited number of schools serving attendance areas with exceptionally high concentrations of children from low-income families. For the purposes of this paragraph, the term "teacher" means a person holding a teaching certificate in the State. Such a person is regarded as a teacher only to the extent that he has a regular instructional assignment and only to the extent that he is taken into account in the computation of pupil-teacher ratios in the State. The eligibility of teachers for such bonuses may be made subject to such conditions, including the completion of prescribed courses of special training, as may be imposed by the local educational agency with the approval of the State educational agency. Such bonuses must be reasonable in amount but must be deemed by the approving State educational agency to be sufficient to attract to, or retain at, such schools the teachers best qualified to help meet the special educational needs of the educationally deprived children to be served by the program of that agency. A project application that includes provision for the payment of teacher bonuses must demonstrate that the applicant's regular salary schedule has not attracted or has not retained sufficient numbers of teachers of high caliber in the area in which the teacher bonus provision is to be made applicable. It must also demonstrate how the local educational agency plans to recruit, hire, provide in-service training to, and evaluate all teachers who will receive bonuses, and how such teachers will serve as an integral part of the title I program. The continuation of the payment of teacher bonuses by a local educational agency beyond a 2-year period shall be conditioned upon a demonstration in project applications for subsequent years that bonus payments in the school district have in fact been effective in attracting and retaining teachers of high caliber and that such teachers have significantly contributed to improving the performance of educationally deprived children. For that purpose, the State educational agency must assume a special responsibility for monitoring and evaluating teacher bonus components of programs in the light of specific measurable goals and must collect and maintain data on the extent of the use and the effectiveness of such teacher bonus components of programs under title I of the Act.
>
> (20 U.S.C. 241e(a)(1))

Comparability

The intent of Congress in title I was to have Federal funds added to local and State funds providing services to disadvantaged children. This would then give to disadvantaged children the "something extra," the added assistance, they needed so desperately to overcome the underachievement they had experienced.

Although the Council supports general aid to education as has been proposed in current legislation in the Congress, we feel that the special characteristics of title I must be preserved. Comparability regulations help this preservation by requiring school districts to spend the same amount per pupil before title I monies are added to supplemental services. This discrimination in favor of the educationally disadvantaged maximizes the positive results of compensatory education. Under no circumstances should title I monies be used as general aid.

The reason for this may have been philosophical. Title I was the first instance of passage of an educational law discriminating *in favor* of poor children. However, philosophical or not, the clear intent of Congress was not to provide general aid, but special assistance to disadvantaged children.

To reclarify this intent, Congress amended ESEA in April 1970 to include a "comparability" statement, and USOE was required to prescribe regulations under this amendment.

The new regulation reprinted below was made effective on October 14, 1971, 18 months after the amendment to title I.

> **§ 116.26 Comparability of services.**
>
> (a) A State educational agency shall not approve an application of a local educational agency (other than a State agency directly responsible for providing free public education for handicapped children or for children in institutions for neglected or delinquent children) for the fiscal year 1972 and subsequent fiscal years unless that agency has filed, in accordance with instructions issued by the State educational agency, information as set forth in paragraphs (b) and (c) of this section upon which the State educational agency will determine whether the services, taken as a whole, to be provided with State and local funds in each of the school attendance areas to be served by a project under title I of the Act are at least comparable to the services being provided in the school attendance areas of the applicant's school district which are not to be served by a project under said title I. For the purpose of this section, State and local funds include those funds used in determinations of fiscal effort in accordance with § 116.45.
>
> (b) The State educational agency shall require each local educational agency, except as provided under paragraph (d) of this section, to submit data, based on services provided from State and local expenditures for

subparagraphs (2) through (7) of this paragraph, for each public school to be served by a project under title I of the Act and, on a combined basis, for all other public schools in the district serving children in corresponding grade level, which schools are not served by projects under that title. Such data shall show (1) the average daily membership, (2) the average number of assigned certified classroom teachers, (3) the average number of assigned certified instructional staff other than teachers, (4) the average number of assigned noncertified instructional staff, (5) the amount expended for instructional salaries, (6) the amount of such salaries expended for longevity pay, and (7) the amounts expended for other instructional costs, such as the costs of textbooks, library resources, and other instructional materials, as defined in § 117.1(i) of this chapter; and such other information as the State educational agency may require and utilize for the purpose of determining comparability of services under this section. The data so provided shall be data for the second fiscal year preceding the fiscal year in which the project applied for under said title I is to be carried out unless a local educational agency finds that it has more recent adequate data from the immediately preceding fiscal year which would be more suitable for the purpose of determining comparability under this section.

(c) The data submitted by the local educational agency based on services provided with State and local expenditures, shall, in addition to the information required under paragraph (b) of this section, show for each public school serving children who are to participate in projects under title I of the Act and for the average of all public schools in the school district serving corresponding grade levels but not serving children under title I of the Act, on the basis of pupils in average daily membership;

(1) The average number of pupils per assigned certified classroom teacher;

(2) The average number of pupils per assigned certified instructional staff member (other than teachers);

(3) The average number of pupils per assigned noncertified instructional staff member;

(4) The amounts expended per pupil for instructional salaries (other than longevity pay); and,

(5) The amounts expended per pupil for other instructional costs, such as the costs of textbooks, library resources, and other instructional materials.

The services provided at a school where children will be served under said title I are deemed to be comparable for the purposes of this section if the ratios for that school determined in accordance with subparagraphs (1), (2), and (3) of this paragraph do not exceed 105 percent of the corresponding ratios for the said other schools in the district, and if the ratios for that school determined in accordance with subparagraphs (4) and (5) of this paragraph are at least 95 percent of the corresponding ratios for said other schools. State educational agencies may, subject to the approval of the Commissioner, purpose and establish criteria, in addition to those specified in this section, which must be met by local educational agencies.

(d) The State educational agency shall not approve project applications under title I of the Act for fiscal year 1972 unless the applicant local educational agency has submitted the data required by paragraphs (b) and (c) of this section. Such data must be submitted to the State educational agency no later than July 1, 1971, and July 1 of each year thereafter. In the case of local educational agencies the data for which indicate a failure to meet the standards for comparability described in this section, such applications must indicate how such comparability will be achieved by the beginning of fiscal year 1973. Applications for fiscal year 1973 and succeeding fiscal years shall not be approved unless the State educational agency (1) finds, on the basis of the data submitted, that the local educational agency has achieved comparability (as described in this section) and has filed a satisfactory assurance that such comparability will be maintained, or, (2) in the case of a local educational agency the data for which indicate a failure to meet such standards of comparability, receives from that local educational agency information with respect to projected budgets, staff assignments, and other pertinent matters showing that comparability will be achieved by the beginning of that fiscal year, together with a satisfactory assurance that such comparability will be maintained during the period for which such application is submitted. Notwithstanding the foregoing provisions no action shall be required of any local educational agency concerning the achievement of comparability with respect to subparagraphs (2) and (3) of paragraph (c) of this section if less than the equivalent of a full time staff member would be required to achieve such comparability.

(e) An agency which has an allocation of less than $50,000 for the fiscal year under parts A, B, and C of title I of the Act, and which is operating schools where children are not to be served under that title shall file a satisfactory assurance that it will use its State and local funds to provide services in its schools serving children who are to participate in projects under that title, which services are comparable to the services so provided in these schools serving children in corresponding grade levels which are not to be served by a project under that title. Such an agency shall also file the data required by paragraph (b) (1), (2), (3), and (4) of this section and the data required by paragraph (c) (1), (2), and (3) of this section.

(f) The requirements of this section are not applicable to a local educational agency which is operating only one school serving children at the grade levels at which services under said title I are to be provided or which has designated the whole of the school district as a project area in accordance with § 116.17(d).

(20 U.S.C. 241e(a)(3))

[FR Doc. 71-14841 Filed 10-13-71; 8:45 am]

The NACEDC supports in principle the concept of comparability. As data are collected this year, the Council will observe and study how many of the 16,000 school districts which now receive title I allotments are actually practicing comparability.

PARENT INVOLVEMENT

The Subcommittee on Parent Involvement for 1971 accepted the following charge relative to its responsibility:

> Follow up on the implementation of current guidelines calling for mandatory parent councils at the district level; review and evaluate the monitoring instrument being used by DCE to insure viability of such parent councils and their access to public information.

Parents, teachers, administrators, and laymen continue to agree generally that parent involvement has a positive influence in improving compensatory education programs. This agreement has been legalized and strengthened through the revised guidelines for the Elementary and Secondary Education Act—Title I, October 14, 1971.

The NACEDC was fortunate in 1970 to be active during the initial stage of the DHEW plans and recommendations for parent involvement; therefore, the Council contributed to specific phases of the current law, amendments, and guidelines for title I projects. The past Council's beliefs relative to parent responsibility in the education of their children, and recommendations pertaining thereto, are manifested in its *1971 Annual Report to The President and The Congress* (pp. 23-34; pp. 31-33 appendix B). We specifically encouraged more emphasis on the establishment of parent advisory councils beyond the present mandate at the system level to each target area school (pp. 24, *1971 Annual Report).*

The Council is cognizant of existing arguments against the formation of parent advisory councils, and it recognizes that such arguments are sometimes justifiable. Some parent advisory councils have been either politically disruptive or apathetically neutral. On balance, however, the Council is persuaded that the merit of the parent advisory council mechanisms established to date has been overwhelmingly positive.

While we are pleased with the accomplishments of parent involvement, we feel it essential that, insofar as possible, teachers in disadvantaged areas must perceive the needs of parents and, in turn, parents feel a sincere involvement in the education of their children and their schools. We recommend that Federal administration of Title I encourage the establishment of parent advisory councils beyond their present mandate at the system level to each target area school.

Whereas Title I has placed primary emphasis on the child, we feel there is further need for extending the insights of parents and teachers. For children to realize their full potential, they must be influenced and guided by parents who both accept their parental roles and strive to improve their personal competence. We recognize an additional need for legislative authorization to develop programs for parents and parenthood. Simultaneously, we endorse existing support for teacher preparation and development in the hope that such programs can be given special emphasis for teachers in disadvantaged areas.

Finally, consistent with the guidelines providing for accessible public information, we recommend that such information should be disseminated to all interested cultural groups in language familiar to the community and accounting for bilingual backgrounds where appropriate.

The implementation of the law and the guidelines and the revitalization of the parents' role in the education of their children become the current problems. Parental "knowledge" of title I is necessary and the need for specific objective programs for parent involvement within local parent target area school councils is paramount today.

In order to execute its charge, the Council developed questions; discussed issues; listened to legal and grassroots interpretations of the guidelines; gathered data through visitations to local target area schools, local and State administrative offices of education, parent involvement workshops, and model parent councils; and received materials from DCE relative to their procedure for the implementation of the guidelines and dissemination of information for public information.

On the basis of all data gathered and opinions formulated, the following recommendations are offered by the Council in order that the guidelines for parent councils may be implemented more effectively, parental knowledge and obligation improved, and DCE monitoring instructions to guarantee accountability and viability of parent councils assured.

The National Advisory Council on the Education of Disadvantaged Children recommends that

1. ESEA amendments or guidelines assure immediately mandatory parental involvement at the local school level.
2. Title I materials be made available to the parent advisory councils in the format and language most easily understood by the entire community.
3. DCE encourage the inservice training of parent advisory council members by providing special incentive grants through the States to

exemplary projects which emphasize parent involvement and parent education.

4. Federal allotments to States for State administration provide for the development of locally oriented, simple, public information for parents.
5. Governing boards of school districts be encouraged to give full recognition to the advisory councils as legitimate advisors in the educational program, as this is required by law.
6. Roles and functions of advisory councils be clearly and jointly delineated by the members of the council and the school district.
7. The governing board of the school district communicate promptly to the members of the advisory council the results of their study of the recommendations made by the PAC.
8. PAC's verify that sufficient funds for secretarial services and other needed services have been applied for by the school district in its title I proposal, and prior to submission of that section of the application, the PAC and the school district come to a common understanding of the budget the PAC will have.
9. When language is a barrier to communication, the school assign staff who are bilingual to assist both the council and the school district in understanding each other's point of view.

Local education agencies and State education agencies need encouragement to become committed to the regulations of parent involvement in title I.

The NACEDC recommends that to make parent advisory councils more effective and to guarantee better parent representation on the councils, the Office of Education declare to the States that local target title I school advisory councils be an essential part of the local education agency's title I application.

Although the NACEDC applauds all forms of parent participation, we prefer the formal structure of an advisory council for each target school building. In addition, we recommend that, in school districts above a given size—such critical size to be determined by the Division of Compensatory Education—there be a parent advisory group to the district. The membership of this district council should include delegates from each target area council.

Examples of model councils, plans for implementation and accountability, and obtainable simplified information for parent and community groups were evident, though not widespread, this year.

The Council is concerned that both PAC's and the school districts are in need of technical assistance to make this regulation effective. *Therefore, the NACEDC recommends that DCE and USOE's regional offices undertake a program of dissemination of simplified regulations to PAC's which are mandated now, and hold regional conferences with these PAC representatives discussing title I and its regulations.*

At present there is a vacuum in the leadership provided from the Federal level, which is undermining the effort the USOE expects in the parent involvement arena.

Further, where desegregation plans are taking effect, whether court ordered or voluntary, it is necessary to both maintain the quality of parent involvement and to insure the participation of the host parents on these councils. The present regulation requires of the membership of a PAC that "more than a simple majority" be parents of title I-eligible children. However, parents in the minority segment of the council could be host parents in a desegregated setting.

DESEGREGATION AND TITLE I

The NACEDC has identified a major problem in the implementation of title I services to eligible children who are dispersed as a result of desegregation plans. The choices are clear: Serve the same children with diluted programs; do not serve the same children who were being served before the desegregation plan became effective; or, resegregate the same eligible population being served for a portion of the school day.

This is not a theoretical crisis, but a practical experience of the school year 1971-72. Tampa-Hillsborough County (Fla.), San Francisco (Calif.), Providence (R.I.), and other school districts have had to make difficult choices in order to serve their title I children and at the same time provide a legal and useful compensatory education program.

There are four problems which need solutions:

1. Should title I monies and services "follow the child" who was being served until desegregation was implemented?

   If monies and services "follow the child," as regulations prescribe and sections of ESEA Title I Program Guide 64 advise, the quality of the program is diluted as the number of children served at each school is reduced. If the services for these disadvantaged children are not diluted, the cost of the title I program soars, which at present the school district cannot afford, nor will the Federal Government subsidize. Therefore, the result of "following the child" most often is dilution of services.

   Why "follow the child"? It has been generally suggested that the longer a disadvantaged child is exposed to compensatory education services, the longer the child retains the advances made under that program. Research with Head Start and Follow Through supports this theory. If this becomes an operating premise, the only course open is to have title I services "follow the child" when desegregation plans are implemented.

   The Council feels that desegregation is a quality component of education, and as such, does have a compensatory effect for title I-eligible children. However, desegregation does not offer all of the components of compensatory education–health, psychological, nutritional, and social services, and inservice training for teachers. Thus, the needs of title I children are not totally satisfied by desegregation plans. They need the combination of compensatory education and the quality component of desegregation to receive equal educational opportunity.

2. Should title I children be separated from the regular classes for the purposes of receiving title I services and at the same time not receiving a diluted program?

   This solution has become a real alternative in practice; so much so, that California has a State guideline which prohibits separation from the regular class for longer than 50 percent of the school day.

   The representatives of the NAACP Legal and Educational Defense Fund who have come before the Council have not been disturbed by this practice of separation for a short portion of the school day, and the California guideline referred to above is acceptable to them.

   The Council recommends that a Federal guideline be issued so that the practice of separation from other students for the purposes of receiving undiluted title I services is not abused.

3. Should the target area and target school concept be revised to accommodate the new attendance-area patterns emerging as a result of desegregation?

   At this time, DCE is testing the revised target attendance-area guidelines among large districts that are desegregating. As before, title I children will be served according to their residence pattern. The composite and sometimes noncontiguous patterns of residence for each school in a desegregation plan will be treated as the contiguous residence area had been treated in title I before 1972. This means that a pupil's address still determines his school, no matter how complicated his school district's desegregation plan may seem. The address will still determine eligibility, and will still affect the new "ranking of attendance areas" by which the concentration guidelines are fulfilled.

4. Should the guidelines on desegregation and ESEA Title I Program Guide 64 include a comment on the private schools?

   First, the NACEDC recommends that DCE issue a statement in these guidelines

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regarding the private schools, so that private schools will be included in the reranking of target attendance areas.

Second, the NACEDC recommends that DCE adjust the wording in Program Guide 64 referring to segregated private institutions. The NACEDC recommends the following wording:

> Title I services are not to be offered on the premises of any school established to evade desegregation or having admissions and curricular policies that systematically exclude minority children. This prohibition should not be construed in such a way as to deny services to title I-eligible children attending private schools, when these schools have substantial minority enrollments due to residence patterns, but lack the legal obligation and the legal remedies to meet ethnic ratios or other enrollment criteria fixed by court orders or other governmental directives.

The Council affirms the premise that desegregation is a quality component of education. The potential conflict between currently designed title I programing and desegregation could work against the success of those very disadvantaged children so much in need of the extra help that compensatory services can provide.

In its examination of existing regulations governing title I and pending legislation for desegregation aid, the Council found conflicts in these three areas: Comparability, concentration, and parent involvement.

Comparability

Title I requires that funds be used to supplement rather than supplant State or local funds previously supporting services available in other schools within a district using non-Federal monies. Title I was designed to stimulate the initiative of local school districts to develop programs for their disadvantaged children. Comparability criteria restrict the gradual replication of title I programs in other schools within a district to avoid use of Federal funds as support for programs which the local school district could itself finance. This limitation negates the expectation that compensatory education will become an integral part of every local district's curriculum. Both in cases where demand for compliance with comparability criteria results in the elimination of a useful compensatory program or the source of Federal funding to assist a financially distressed school district, it is the disadvantaged child who suffers.

As desegregation plans disperse minority students who are title I eligible throughout a district, comparability becomes a problem. Local administrators must decide whether to violate comparability by including some "not as" educationally disadvantaged with title I-eligible students or to separate title I-eligible children for some period of time during the school day.

If in only a few instances across the country, title I children are desegregated for any length of time, the whole purpose behind a school district's desegregation effort is in jeopardy. The Council recognizes the impracticality of a total rejection of the "pull-out" technique. Some States, such as California, have taken the initiative to develop a guideline which permits a maximum of 50 percent of the school day to be devoted to targeting compensatory services to eligible children. The Council supports such efforts to resolve the dilemma, but encourages the separation of minority children for the briefest possible time from their regular classes.

Concentration

Current regulations stipulate that funds be concentrated on those children determined to be "most in need" of special assistance. If such children are diffused among a number of classroom as the result of a desegregation plan, title I services cannot be provided to them without the school's being guilty of (1) "general aid" violation, i.e., extending compensatory services to *all* children in the classrooms, or (2) resegregating title I children for some length of time in order that they exclusively may receive such services.

The future of the concept of educational funds and services which will "follow the child" has been negated by the provisions of Program Guide 64.

Parent Involvement

Public Law 91-230 (April 1970) gives additional emphasis to the regulations (Program Guides 44, 46, and 46A) calling for the involvement of parents of children receiving title I services in the planning and operation of such programs. Composition of parent advisory councils now calls for "more than a simple majority" of title I parents without regard for the fact that, in a desegregated setting, these children would no longer be in the majority of the composition of the host school.

Desegregation efforts further amplify the wisdom of title I guidelines requiring the involvement of parents in the education of their children. The accountability and monitoring functions performed by such parent advisory councils are even more critical where community support and understanding are esssential to the success of desegregation. The integrity of parent advisory councils must, therefore, be protected and provisions made to insure the participation of host parents.

Underlying all these is the paradox that current title I guidelines seem to require the resegregation of students in order for them to qualify and receive compensatory educational services.

Compensatory education was designed as a detour to insure that disadvantaged children, still limited by a segregated educational setting, would receive services beyond the normal curriculum to improve their educational attainment. That Congress never intended to legislate the continuance of racial or minority group isolation through title I is evidenced by the fact that the title was required to be administered in accordance with the Civil Rights Act of 1964.

Desegregation and compensatory education *both* persist as quality components of education. Government has not and should not encourage segregation through regulations governing a $1.5 billion program which seem to require segregation as a requisite for funding.

THE PRIVATE SCHOOLS[1]

In 1969 this Council devoted a major portion of its *Fourth Annual Report* to the participation of nonpublic school children in title I programs. The report highlighted several problems at the Federal, State, and local levels and made several specific recommendations that would insure that the mandate for such participation (section 116.19) would be administered to afford equal opportunity for participation to eligible children enrolled in nonpublic schools.

The Council reviewed this regulation and its administration again this year, consulting extensively with public and nonpublic school officials, at all levels. On the basis of this review, the Council has concluded that, while there has been marked improvement in administration of this provision of the law—especially at the Federal level—there remain many administrative problems at the LEA level which still impede proper compliance with the law, and in fact, reduce the chances of participation for many eligible children, solely because they attend nonpublic schools.

The Council emphasizes "administrative problems" because there appears to be remarkable consensus that the congressional mandate in the law gives adequate direction and scope to administrators at all levels in both sectors, and that only limited changes in the legislation itself (specified below) need be recommended in order to improve the participation of nonpublic school children.

Legislative Provisions

While there is evidence of improvement in most States in the acceptance and implementation of this provision by the public education agencies legally responsibile for administering it, there nevertheless remain many instances in which provisions of State constitutions or administrative policies of State or local agencies effectively or completely prevent equitable participation.

In view of the wide disparity among States in this regard and resulting inequities in opportunity and participation by nonpublic school children, the Council recommends that section 143 of title I be amended to incorporate a "bypass" mechanism, similar to title III ESEA, section 307 f(1-2).

> (f) (1) In any State which has a State plan approved under section 305(c) and in which no State agency is authorized by law to provide, or in which there is a substantial failure to provide, for effective participation on an equitable basis in programs authorized by this title by children enrolled in any one or more private elementary or secondary schools of such State in the area or areas served by such programs, the Commissioner shall arrange for the provision, on an equitable basis, of such programs and shall pay the costs thereof for any fiscal year out of that State's allotment. The Commissioner may arrange for such programs through contracts with institutions of higher education, or other competent nonprofit institutions or organizations.
>
> (2) In determining the amount to be withheld from any State's allotment for the provision of such programs, the Commissioner shall take into account the number of children and teachers in the area or areas served by such programs who are excluded from participation therein and who, except for such exclusion, might reasonably have been expected to participate.

The Council has studied the other bypass provisions already available in ESEA and concurs with private school practitioners that this is the most inclusive and most sophisticated provision for this purpose.

Planning and Evaluation

In its *Fourth Annual Report* (1969) this Council emphasized the need for nonpublic school officials to be involved in the planning and evaluation of title I programs designed to serve disadvantaged children enrolled in nonpublic schools. The Office of Education regulations are now more explicit in requiring public school officials to consult "with persons knowledgeable of the needs of these private school children and assigned a consultative role to private school 'authorities' and private school officials." The Office of Education's recently released handbook *Participation of Private School Children* includes a section on the "Role of the Private School Administrator" which states, in part:

> The regulations regard consultation with private school representatives as something apart from meetings with advisory committees or parent councils. The consultation with private school representatives would be of a detailed and technical nature, getting into the areas of diagnosis, needs assessment, evaluation design, etc. The results of this type of consultation would be

[1] Although the legislation refers to these participants as children attending the "private schools," many documents do not. The terms "private" and "nonpublic" are used herein interchangeably, with the preferred usage being "private schools," for compatibility with the regulations.

brought to an advisory committee or parent council, consequently the inclusion of a private school representative on an advisory committee or a parent council does not automatically insure compliance.

This stress on the involvement of nonpublic school officials in planning is an excellent addition to the earlier Federal guidelines but the disregard of these institutions in a number of States leads the Council to recommend a careful check on compliance. It is suggested that project applications and statistical report forms be revised so that the local education agencies must demonstrate the involvement of private school officials in the planning of programs to serve disadvantaged children in nonpublic schools and in the collection and reporting of data for evaluating programs. It is also recommended that the project application include a provision by which designated nonpublic school authorities will verify and concur in the data presented and the planning and program provisions of the application. The requirement of this "signoff" provision should greatly increase the participation of nonpublic school officials in planning and evaluation of projects.

The Council believes that the participation of nonpublic school children would be improved if the regulations encouraged or required the establishment of State advisory councils on which representatives from the nonpublic schools would be included.

A further recommendation for improving State and local compliance with the regulations and guidelines is to establish appropriate review and complaint procedures when noncompliance by a State or local education agency is alleged. Presently, there is no recourse for the nonpublic school administrators who allege noncompliance.

State Allotments and Nonpublic School Eligible Children

A State receives its title I allotment based upon the number of children who qualify under a given legislated poverty formula. At this point, the State education agency does not know how many eligible children attend nonpublic schools.

After receiving its allotment, the State must then distribute the funds according to applications from LEA's which send it legal, qualifying proposals. It is at this point that a determination of the number of nonpublic school eligible children should be made.

For example, in New York State, all children are tested on the Pupil Evaluation Program (PEP) testing instrument, and receive a stanine rating in the 3d, 6th, and 9th grades. New York State determines that any child below the 4th stanine is educationally diasdvantaged.[2] Ten to 14 percent of all children in the State who have been determined in this manner to be disadvantaged attend nonpublic schools.

The Archdiocese of New York has taken this one step further. In 1970-71 they sampled 25 percent of the children in New York City who live in the sharply delineated poverty area. Based upon the PEP test results, 7.7 percent of these children attended the nonpublic schools in New York City. Again in 1971-72, they surveyed all the students in the poverty area using the PEP scores, and had received 75 percent response to date. Again, 7.7 percent of the eligible children (according to this determination) are enrolled in the nonpublic schools.

New York City gives 5.6 percent or $7 million of service to the nonpublic school eligible children, a full $3 million less than 7.7 percent of the city funding allotment would provide. An increase of 50 percent would enhance immeasureably the opportunity for the title I-eligible children attending nonpublic schools in New York City. The loss of the $3 million to the city's title I budget would represent a loss of 2.1 percent and would have an effect, but not as dramatic an effect as the nonpublic schools envision.

The NACEDC recommends that all LEA's should, in their needs assessment, determine, according to the poverty formula and some other educational standard, the educationally disadvantaged children attending their nonpublic schools.

The NACEDC recommends further that these statistics on nonpublic school enrollments be applied to the determination of the title I application from the public school district, so that nonpublic school children receive an equitable share of services based upon the proportion of nonpublic school children to the total number of eligible children in the district.

Improving Practical Opportunity for Participation

In several circumstances, it is difficult if not impossible to provide title I services to disadvantaged children enrolled in nonpublic schools. In some cases, the entitlement of a local education agency is inadequate to support a substantial program. Also, eligible children are too few in number in any one school site to justify a substantial "target school" program. There are also cases in which a significant number of eligible children attend nonpublic schools outside the boundaries of the local education agency.

The NACEDC recommends that DCE implement an equitable and workable solution to this problem to be effective at the start of fiscal year 1973.

In 1969 the Council reported that "private school children often participate in programs only a few hours each month, and in programs not designed for their special needs." The more comprehensive and systematic involvement of nonpublic school officials as recommended above should greatly improve this situation.

[2] This would mean that the child lags behind his class by 1 to 3 years in achievement.

The NACEDC recommends that services to disadvantaged children enrolled in nonpublic schools be provided in a manner and location most appropriate to the nature of the program and to the population to be served.

Reporting and Dissemination

As previously noted, the Office of Education has recently published a handbook for State and local school officials entitled *Participation of Private School Children.* This is a great step forward in following the recommendation of this Council in 1969 that "the Office of Education put into one updated document regulations and requirements on the participation of nonpublic school children in the various aspects of the title I program."

A related recommendation in the 1969 report "that the Office of Education disseminate examples of programs of successful participation of nonpublic school pupils" has not yet been implemented. The Council considers this an important way to focus attention on promising practices rather than to restrict concern to the formal requirements of the law. To be most effective, this dissemination should include seminars and workshops as well as written descriptions of programs.

This would overcome the persistent problem faced by public school administrators baffled by their inability to plan useful title I projects for disadvantaged children attending nonpublic schools. Such inability is often due not to incompetence, but to confusion about the network of laws, and regulations governing aid to children enrolled in private schools.

As the preface states in the new Office of Education handbook: "The provision of services for children enrolled in private schools called for a whole new set of relationships, both administrative and programmatic, to be established and maintained. At the outset, no one really knew a 'best way' to implement the law as it affected private school children."

The handbook not only contains a compilation under one cover of the excerpts from the law relevant to serving disadvantaged children enrolled in nonpublic schools, and the regulations and guidelines that pertain to their participation (with a brief explanation of these provisions), but also outlines some of the problems encountered at State and local levels and some possible solutions including suggested procedures in project development to create opportunities for meaningful participation. If the distribution of this helpful handbook can be followed by seminars and workshops, the Council believes that the development of meaningful programs for nonpublic school children and their participation in them will be greatly improved.

Constitutionality

First, the Council would like to begin this section of the report with the statement that *at no time* is title I money turned over to nonpublic school administrators. This is in direct observance of numerous laws, including the constitutional amendment governing separation of church and state.

The Council would like to point out that many of the legal and constitutional obstacles to State administration of title I for nonpublic school children have been overcome. Many State and local education agencies found severe restrictions with respect to their respective State constitutions and statutes and the application of title I to nonpublic school children. Note that while State constitutions and statutes restrict the options available to provide services to eligible nonpublic school children, this, in fact, does not relieve that agency of its legal responsibility to approve title I applications which meet requirements set forth in Federal law, regulations, and guidelines.

In order to receive title I funds, the State Attorney General must sign an assurance to the U.S. Commissioner of Education stating that all title I regulations will be observed, even if they conflict with State law. Yet with respect to three States—Missouri, Nebraska, and Oklahoma—the Office of Education is aware of noncompliance with the regulations, section 116.19, on service to children enrolled in nonpublic schools, and no enforcement action has been initiated.

The Council recommends that any State which is not in compliance with section 116.19 be informed of the Commissioner's intention to enforce the law, by the end of fiscal year 1972.

Conclusion

The Council believes that the guidelines and regulations as they affect the nonpublic school child are generally well-defined, workable, and meaningful. The breakdown comes in the interpretation and enforcement of the guidelines. This is the area needing improvement.

The main purpose of our effort is to develop implementation at the local and State levels in order to meet the requirements of the law and to enable the children in the nonpublic schools to get the services that they need and that they are entitled to receive under title I.

We hope that the above recommendations, achieved in concert with participation of private school practitioners at a NACEDC conference in Chicago in early January 1972, will begin to remedy an obvious weak link in the administration of title I. We also hope that participation we have encouraged among the private school administrators will not cease with the Chicago meeting, but continue throughout the year, so that it may illumine for us the difficulties administrators face in providing day-to-day services to disadvantaged children in a most dedicated and appreciated way.

THE SUBPROGRAMS

1. Follow Through

The NACEDC is concerned about the realignment of priorities at the U.S. Office of Education, which would discourage innovation and in its place encourage basic studies for title I. The Council would understand this move taking place after extensive research and evaluation demonstrating that the new course is proven and effective. Basic studies in mathematics and reading are very necessary as components of a compensatory program; however, the Council is concerned that emphasis on this style of teaching and testing is a sign that Federal education leaders have given up trying to find the best way to upgrade the education of disadvantaged children.

When title I was first enacted, latitude was given to the LEA's deliberately to develop locally oriented programs serving the individual needs present in the local school district. Innovation was encouraged.

Title I is now moving to a stricter interpretation, which seeks replication of components, which while they are certainly valid approaches to learning, show no improvement over the approach used 10 years ago. And title I is doing this without appreciable evaluation studies which demonstrate that this method is the best way to operate.

For example, the Follow Through program is being redefined and rearranged in the next 5 years, so that more impact will be made upon title I services. The successes of Follow Through, as documented in the Stanford Research Institute's study, are successes beyond the basics, i.e., parent involvement, student attitude toward school, and so forth. However, in the realignment of priorities at USOE, Follow Through will be altered, costs lowered, and components removed; and this diluted program—not the original successful model—will be the one that impacts title I.

Follow Through was conceived in 1967 as a service program funded at a level of $120 million a year to capitalize on gains made in Project Head Start. Early findings documented in studies of Head Start noted that rapid gains made by children in that program were generally diminished by the public school environment. Follow Through was charged with responsibility of maintaining and to improving upon these gains in grades K-3. However, in October 1967, the funding level of Follow Through was cut to $15 million for 2 years, a cut of more than 90 percent. Consequently, USOE designed this project as a research and development laboratory in early childhood education.

During the 1st year Follow Through served 2,900 children, and in 1971 70,000 pupils participated. Follow Through has made significant differences in the learning of these poverty-level children.

Greater achievement gains by Follow Through children than by non-Follow Through children have been documented. They consistently had more positive attitudes toward school. Parents of Follow Through children were better informed and more completely involved in the educational program: they visited school more often, helped in the classroom, and liked the teachers.

Follow Through teachers visited the students' homes more often, placed a high valuation upon parent participation, and showed a markedly greater satisfaction with the improvement of the children.

Approaches to learning emphasized the small-group and individual instruction in the Follow Through program in contrast to the large classes in the usual public school environment.

The Five Year Plan

In late July 1971 the Council was informed of the plans of DCE to modify the Follow Through program. The outstanding results of the national laboratory, 80 percent of which focused on children from low-income families, was now to be disseminated to all title I projects in the 16,000 school districts receiving money.

Currently SEA and LEA title I plans are emphasizing the lower elementary grades, and the opinion held by many State coordinators of title I is that this is where title I dollars have their maximum impact. The direction from USOE is to encourage this move and provide freely from the data and experience of Follow Through to help States follow this course.

Over the years, the components of an effective title I program have been parallel to those of the typical Follow Through project: instruction; health, nutrition, psychological, and social services; and inservice training.

The usual cost per child in a Follow Through project is $772 per pupil, from OEO funds under the Economic Opportunity Act—$437 of that is needed as supplementary funding, according to DCE officials, to pay for instruction, parent involvement, health services, fixed charges, and community services. DCE feels that fully 35-43 percent of the $772, or $274-$334, can be assumed by the Federal, State and local sources, and will cover administrative costs,

food, transportation, equipment, remodeling, regular staff, and consultative services.

What DCE desires to accomplish in the Five Year Plan is to reduce the cost of Follow Through project activities, involve SEA's in developmental activities, impact existing compensatory education programs, coordinate State and local community resources for disadvantaged children, and initiate and refine early childhood education strategies by SEA's and LEA's.

After evaluation of the Follow Through program through 1975-76, USOE anticipates a reduction in program funding from $69 million to $15 million.

From 1971 to 1976, USOE planned to involve 778,676 children, from 74,800 in fiscal 1972 to 265,123 in fiscal 1976. The plan was to reduce significantly the costs of research and development from $43.5 million to $9 million in 1976.

Matching funds sought from other sources or title I will be increased by significant amounts each year to $50 million in 1976.

The purpose is to proliferate the Follow Through results and experience and impact the full title I program nationwide.

The NACEDC is interested in the Five Year Plan for Follow Through proposed by DCE, and would like DCE to demonstrate that an increase in services to disadvantaged children can really result from a cost reduction effort.

The NACEDC supports the move to encourage concentrating title I spending on the lower elementary grades, and to proliferate the positive experiences from Follow Through throughout title I projects.

2. The Interstate Uniform Migrant Student Record Transfer System

It is thought that there are approximately 350,000 school-age children of agricultural migrant workers, but one of the problems of migrant education has been to pinpoint exact numbers. It is estimated that 90 percent of these children do not finish high school.

The lack of records on migrant children has led to a child's being immunized against the same disease several times, being relegated to the back of the room with a crayon for lack of language facility, and being assigned lessons covered in other schools because no one could determine the attained level of achievement.

Merely 3 years ago this was the pattern. Any attempt to gather information about the migrant child would mean weeks of waiting for records in the mails and most often, no information was available.

Last year, in fiscal year 71, $3.1 million in title I funds was spent to initiate the Interstate Uniform Migrant Student Record Transfer System. Title I program coordinators throughout the States conceived this computerized program in 1968, and selected eight representatives to design the form. Thirty months later the form was agreed upon by all States and in 1969, with commitments from each participating State totaling $426,000, the Arkansas SEA was granted a developmental contract to establish the system.

Last year, the pilot program coordinated Arkansas, Colorado, Kansas, Missouri, New Mexico, Oklahoma, and Texas, and now schools in all 48 mainland States can retrieve critical data on any migrant child and usually *within 4 hours.*

The Operation of the System

There are 130 regional terminals of a computer based at the University of Arkansas Medical Center. A clerk at a school receiving a migrant child telephones the nearest terminal to retrieve crucial information about that child.

The terminals are located around the country in geographically significant places; the selection of these sites was determined in concert with telephone officials. Two factors affected the choice of sites: concentrations of migrant children and the cost of the phone calls to the area.

The terminals are simple teletype machines connected to the central data bank at Little Rock, Ark. The schools utilize leased lines to the terminals, paid for from title I.

When a child arrives at a school, if that child had his or her record, then the school clerk can use the identifying code to submit an enrollment notice to the computer. A facsimile of the form is shown as figure 1.

If the child does not have his record, and does not know what school he last attended, the school clerk calls the computer, and gives the child's name, birthplace, sex, and birthdate. Immediately the computer will respond with the student's ID number, critical medical information, and the reading and mathematics level he has achieved. Using the ID number, the clerk can retrieve the full transcript within 4 hours.

The Record Transfer System was budgeted at $1.9 million for fiscal year 1972 as it expanded to the 48 continental States. Much of this money was used to pay the salaries of the teletype operators in the national system.

The NACEDC compliments the Migrant Programs Branch and DCE for implementing this sytem, and recommends that USOE now accumulate data on how many migrant children are being served and their educational achievement with the data already collected.

This exemplary project, which was carried out by Federal, State, and local cooperation and planning, is a highlight of fiscal years 1971 and 1972. The Council is pleased to be able to present this development to the President and the Congress as an example

of interstate and intergovernmental cooperation, and as an example of a successful answer to a difficult task.

Now that Phase I and II of the program have been implemented successfully, the NACEDC recommends that there be a Phase III, which will utilize this information for effective delivery of services to migrant children.

3. Neglected and Delinquent Children in State Institutions

The NACEDC is very concerned about the children who are sent to institutions entrusted to care for them.

One in every six Americans is a child between the ages of 10 through 17. This age-group population has the greatest number of arrests per capita—half of the arrests for serious crimes are of children from 10 through 17.

After arrest and conviction, the recidivism rate for children is 75-85 percent. Children are crime repeaters at rates approximately double those of the adult convicted population.

Thirteen percent of title I funds are allocated for dependent and delinquent children in State institutions. Generally these funds are channeled from the SEA to State institutions for the children, or to the LEA's receiving neglected children from State facilities into local public schools. These funds pay for one-half the cost of educating these children.

It is most significant that children who are wards of the State, due either to circumstances beyond their control (neglected and dependent children) or to their own misconduct (the delinquents), are faced with the problem of interrupted or frustrated schooling, in addition to the stigma of a court order declaring the child to be a "delinquent" or a "dependent and neglected" child. It should be said that these children are doubly disadvantaged.

If any segment of our school-age population is in need of specialized superior educational opportunities, certainly it is this one.

The NACEDC suggests that a task force made up of Federal, State, and local administrators, law enforcement officers, and judges be established by June 30, 1972, to report by December 30, 1972, to DCE and the NACEDC on improving the expenditures of title I in this area to effect maximum delivery of services and superior program for these children.

The NACEDC requests that DCE evaluate carefully programs in these institutions and report exemplary projects to the Council by June 1972.

The NACEDC requests that DCE release by July 1, 1972, the handbook on this legislation, so that administrators of programs in State institutions for the neglected and delinquent have a better working and planning ability for the next fiscal year's expenditures. At this point, there is not available any current compilation of guidelines or directions from USOE, and USOE should take some leadership in this field.

The Council does have reports of outstanding achievement by students in the setting of a State institution for delinquents. For example, in the average 8 months' stay, these children advanced 3 years in reading at one State school, from grade 3 to grade 6. However, these were students who should have been freshmen in high school. Thus, when they return to their environment, they have 6th grade reading skills in the 9th grade.

The NACEDC's preliminary work in this subject area reveals that the USOE approach to allocations for children in institutions for the neglected and delinquent has been that of a "check-writer."

Although the Council does not want to see USOE enter the criminal justice field without proper credentials and background, the USOE performance with regard to these children has been shortsighted and ineffectual.

Fortunately, there are examples of State leadership in this field, but these examples have yet to be brought to light and disseminated to others.

Therefore, the above recommendations of the Council, which are basic to disseminating information on this program, have not yet taken into account the actual practices among the States.

4. The Right To Read

The President's program—"The Right To Read"—which has been charged with the responsibility of eliminating functional illiteracy by 1980, is floundering in the USOE bureaucracy for lack of funds, commitment, and separate legislation.

As early as October 1969, former U.S. Commissioner of Education James E. Allen, Jr., testified before the Education Subcommittee of the House Education and Labor Committee on the new proposed focus of the Office of Education.

Designed to be a program to meet the needs of the greatest population in the United States, of both children and adults, The Right To Read also had great appeal among educators. The goal is to accomplish functional literacy for 99 percent of 16-year-olds and 90 percent of those over the age of 16 by 1980.

However, in 1972, we see a metamorphosis in The Right To Read program. Funded at a level of $10 million for fiscal year 1972 out of discretionary monies from *eight* different titles operated by USOE, The Right To Read is at a cross roads. Legislative constraints, bureaucratic lethargy, and administrative atrophy have frequently provided obstacles to the program.

At present, The Right To Read is not a single program with separate legislation to implement a single accepted approach to reading achievement. The staff has gathered information on the current

Figure 1. UNIFORM MIGRANT STUDENT TRANSFER FORM

TRANSACTION CODE

K1.

STUDENT LAST NAME | STUDENT FIRST MIDDLE INIT. | SEX | | | BIRTHPLACE CITY | BIRTHPLACE COUNTY | STATE

RELATION F-FATHER M-MOTHER G-GUARDIAN | * HEAD OF HOUSEHOLD

		NAME	ADDRESS	CITY	ST	ZIP	R	H
S1.	SCHOOL 1 →							
P1.	PARENT GUARDIAN							
P2.	PARENT GUARDIAN							
S2.	SCHOOL 2 →							
P3.	PARENT GUARDIAN							
P4.	PARENT GUARDIAN							
S3.	SCHOOL 3 →							
P5.	PARENT GUARDIAN							
P6.	PARENT GUARDIAN							
S4.	SCHOOL 4 →							
P7.	PARENT GUARDIAN							
P8.	PARENT GUARDIAN							

SCHOOL DATA

SCHOOL NO. 1

SCHOOL ID | DATE ENROLLED MO. DAY YR. | DATE WITHDREW MO. DAY YR. | ABS. | DAYS PRES. | ENROLL

SCHOOL NO. 2

SCHOOL ID | DATE ENROLLED MO. DAY YR. | DATE WITHDREW MO. DAY YR. | ABS. | DAYS PRES. | ENROLL

SCHOOL NO. 3

SCHOOL ID | DATE ENROLLED MO. DAY YR. | DATE WITHDREW MO. DAY YR. | ABS. | DAYS PRES. | ENROLL

SCHOOL NO. 4

SCHOOL ID | DATE ENROLLED MO. DAY YR. | DATE WITHDREW MO. DAY YR. | ABS. | DAYS PRES. | ENROLL

SCREENING EXAM RECORD

	SCHOOL IDENTIFICATION	TYPE EXAM. Dip H	Dip S	M-Ft S	M-Ft D	Mx	←TB R	TB TYPE	DATE ADM. MO	YR.	ABNORMAL YES/NO	RECOM. TRT. CODE
H1.								N-NEG				
H2.								P-POS				
H3.								A-ACT				
H4.												
H5.												
H6.												

TREATMENT RECORD

	ACTUAL TRT. CODE	DATE TRT. START MO/YR	DATE TRT COMP MO/YR	FOLLOW UP OF LINE NO
H1.				
H2.				
H3.				
H4.				
H5.				
H6.				

	OTHER HLTH DATA YES/NO	URGENT * YES/NO
H1.		
H2.		
H3.		
H4.		
H5.		
H6.		

* SPECIFY CONDITION MARKED URGENT ON LINE NUMBER

IMMUNIZATION RECORD

INOCULATION OR VACCINATION	SERIES NO.	DATE ADM. MO/YR	NEXT INOCULATION DATE MO/YR
I101 DPT			
I102 DT			
I103 MEASLES (GERMAN)			
I104			
I105 MEASLES (RED)			
I106			
I107 MUMPS			
I108 POLIO (INOCULATION)			
I109			
I110 POLIO (ORAL)			
I111			
I112 TETANUS			
I113 INFLUENZA			
I114 TYPHOID PARA-TYPHOID			
I115			
I116 SMALLPOX			
OTHER I117			

HEALTH

C101 ALLERGY
C102 EPILEPSY
C103 DIABETES
C104 RHEUMATIC HEART
C105 OTHER HEART
C106 LUNG (NOT T.B.)
C107 ASTHMA
C108 HEMOPHILIA
C109 ANEMIA
C110 NERVOUS STOMACH
C111 DRUG SENSITIVITY
C112 OTHER

MOST RECENT EXAM

TYPE	DATE MO/YR
PHYSICAL	
VISUAL	
AUDIO	
DENTAL	
T.B.	

TESTING INFORMATION

	SCHOOL IDENTIFICATION	TEST NAME CODE	FORM	TEST LEVEL CODE	DATE MO/YR	SCORE	SCORE TYPE R/S	%	G/E	S	O
T1.											
T2.											
T3.											
T4.											
T5.											
T6.											

PROGRAM TYPE

SCHOOL NO.	0	1	2	3	4	5	6	7	8	9
E 1										
E 2										
E 3										
E 4										

TEST NAME 16 | 17

STUDENT LAST NAME | STUDENT FIRST MIDDLE INIT. | SEX | | | BIRTHPLACE CITY | BIRTHPLACE COUNTY | STATE

ACADEMIC CHARACTERISTICS READING

		READING ABILITY 01 NON READER 1	BELOW AVERAGE 2	AVERAGE 3	SKILLED 4	SPECIFIC COMPREHENSION SKILLS 02 GETS MAIN IDEA WEAK 1 STRONG 2	03 RECALLS DETAILS WEAK 1 STRONG 2	04 FOLLOW SEQUENCE EVENTS WEAK 1 STRONG 2	05 VOCAB KNOWLEDGE WEAK 1 STRONG 2	06 ABIL TO INFER MEANING WEAK 1 STRONG 2	SPECIFIC WORD ATTACK SKILLS & DIFFICULTIES 07 KNOWS BEGIN END SOUNDS WEAK 1 STRONG 2	08 PAYS ATTEN TO SYLLABLES WEAK 1 STRONG 2	09 USES CONTEXT CLUES WEAK 1 STRONG 2	10 SPEED OF RECOG WEAK 1 STRONG 2	11 SOUND DISCRIMINATION WEAK 1 STRONG 2
R1.	1														
R2.	2														
R3.	3														
R4.	4														

ACADEMIC CHARACTERISTICS ORAL

		PRIMARY LANGUAGE 12 ENGLISH 1	SPANISH 2	OTHER 3	ABILITY TO COMM IN ENGLISH 13 DIFFICULT 1	AVERAGE 2	SKILLED 3	SPEECH DISORDER 14 SEVERE 1	MILD 2	NONE 3	HEARING DISORDER 15 SEVERE 1	MILD 2	NONE 3	UNDERSTAND DIRECTIONS 16 POOR 1	FAIR 2	GOOD 3
R1.	1															
R2.	2															
R3.	3															
R4.	4															

ACADEMIC ACHIEVEMENT

		MATH COMP 17 DIFFICULT 1	AVERAGE 2	SKILLED 3	COMPOSITION 18 DIFFICULT 1	AVERAGE 2	SKILLED 3	SCIENCE 19 DIFFICULT 1	AVERAGE 2	SKILLED 3	MATH CONCEPTS 21 UNDIFFICULT 1	AVERAGE 2	SKILLED 3
R1.	1												
R2.	2												
R3.	3												
R4.	4												

SPECIAL INTERESTS AND ABILITIES

CREATIVE

		DRAWING 01 INTEREST 1	ABILITY SOME 2	STRONG 3	PAINTING 02 INTEREST 1	ABILITY SOME 2	STRONG 3	CARVING 03 INTEREST 1	ABILITY SOME 2	STRONG 3	CREATIVE WRITING 04 INTEREST 1	ABILITY SOME 2	STRONG 3	MUSIC 05 INTEREST 1	ABILITY SOME 2	STRONG 3	DRAMA 06 INTEREST 1	ABILITY SOME 2	STRONG 3
W1.	1																		
W2.	2																		
W3.	3																		
W4.	4																		

SCIENCE

		INDUSTRIAL ARTS 07 INTEREST 1	ABILITY SOME 2	STRONG 3	HOME ECONOMICS 08 INTEREST 1	ABILITY SOME 2	STRONG 3	NATURAL SCIENCE 09 INTEREST 1	ABILITY SOME 2	STRONG 3	SOCIAL SCIENCE 10 INTEREST 1	ABILITY SOME 2	STRONG 3	MATH 11 INTEREST 1	ABILITY SOME 2	STRONG 3
W1.	1															
W2.	2															
W3.	3															
W4.	4															

READING

		MYSTERIES ADVENTURE 12 INTEREST 1	ABILITY SOME 2	STRONG 3	BIOGRAPHY 13 INTEREST 1	ABILITY SOME 2	STRONG 3	NON-FICTION 14 INTEREST 1	ABILITY SOME 2	STRONG 3
W1.	1									
W2.	2									
W3.	3									
W4.	4									

SPORTS

		SCIENCE 15 INTEREST 1	ABILITY SOME 2	STRONG 3	SPORTS 16 INTEREST 1	ABILITY SOME 2	STRONG 3	GROUP SPORTS 17 INTEREST 1	ABILITY SOME 2	STRONG 3
W1.	1									
W2.	2									
W3.	3									
W4.	4									

CODES LIST
FOR
UNIFORM MIGRANT STUDENT TRANSFER FORM

TREATMENT CODES

00 Not Applicable
01 Medication Only
02 Referral to physician, dentist, optometrist, clinics, etc.
04 Surgery
08 Physical Therapy
11 Leg brace
12 Other medical or surgical follow-up or care
20 Filling of tooth (teeth)
21 Extraction of tooth (teeth)
23 Prophylaxis
24 Capping of tooth (teeth)
25 Dentures
26 Partials (removable bridge)
27 Permanent bridge
28 Crown
29 Root Canal
39 Other dental
40 Glasses
41 Contact lenses
42 Patching of eye
50 Visual training for reading problem
51 Visual training for crossed eyes
52 Visual training - eye rotation
53 Visual training - stereoscope
54 Visual training - chairoscope
55 Visual training - tracing
56 Visual training - parquetry blocks
57 Visual training - geometric templates
58 Visual training - other
59 Other vision
60 Hearing aid
61 Other hearing training
65 Speech therapy
69 Other hearing
72 Instruction in special classes
73 Special attention by teacher

OCCUPATION CODES

01 Harvesting or Picking (hand)
02 Harvesting or Picking (machine)
03 Equipment Operator
04 Pruning
05 Cultivation (hand)
99 Other

TEST NAME CODES

01 Wide Range Achievement Test
02 Stanford Achievement Test
03 California Achievement Test
04 Botel Reading Test
05 Arithmetic Achievement Test
06 Metropolitan Readiness Test
07 SRA Achievement Test
08 Iowa Test of Basic Skills
09 California Test of Basic Skills
10 Sequential Tests of Educational Progress
11 Child Development Analysis
12 Gray-Votaw-Rogers General Achievement Test
13 Peabody Picture Vocabulary
14 General Aptitude Test Battery
15 Iowa Tests of Educational Development
16 Other (1st)
17 Other (2nd)

COUNTRY OF BIRTH CODES

Make no entry under "Country" on the Transfer Record for any student either born or naturalized a U.S. citizen.

For all other students, if name of the country is

one word, then use first two letters of the name;
more than one word, then use first letter of the first two words in the name.

TEST LEVEL CODES

1 - Primary (Grades 1-3)
2 - Intermediate (Grades 4-6)
3 - Jr. High (Grades 7-9)
4 - Sr. High (Grades 10-12)

PROGRAM TYPE CODES

0 Health - Recreation
1 Pre-School
2 Tutorial Services
3 Cultural Enrichment
4 Remedial Reading
5 English as a Second Language
6 Language Development
7 Vocational Education
8 Remedial Mathematics
9 Other

INOCULATION SERIES CODES

0 Not applicable
1 1st
2 2nd
3 3rd
4 Revaccination
5 Booster
8 One shot if only one required
9 Unknown

TRANSACTION CODES

G Generate a data bank record
E Enrollment of Student, Print out of Record
W Withdrawal (update also implied)
U Update existing student record
T Terminate existing student record
Q Request Critical Data Record

TESTING SCORE TYPE

R/S Raw Score
O/O Percentile
GE Grade Equivalent
S Stanine
O Other

$500 million expenditure by USOE in scattered, unrelated reading projects. It has developed models for dissemination throughout the Nation. It has kept most current with the latest trends in teaching of reading skills, and has begun to select Right To Read centers throughout the country. Approximately 70 centers have been selected to date.

While this organizational and fiscal difficulty proceeds, 90 percent of the 700,000 school dropouts each year are classified as slow readers. This cumulative waste of human talent and productivity becomes far more costly to the Government than the original outlay for a reading program would. Costs for income supplements, extra vocational training, and even criminal rehabilitation would undoubtedly be lowered by a strengthened attack on the problem of functional illiteracy in the country.

The NACEDC recommends that the Congress amend ESEA to target the $500 million in reading program money scattered throughout USOE to The Right To Read program.

In addition, the NACEDC recommends that there be separate legislation for The Right To Read program, and separate funding, so that the USOE focus on reading as a goal for the seventies can be effectively accomplished, and so that functional illiteracy can be erased in the next decade.

TITLE I TEACHERS

The NACEDC has not been able to go beyond a brief review of the role of the teacher in poverty-level schools and during the implementation of desegregation plans. This study is continuing for the next year, as the Council examines models highlighted by the States in State publications (for example, the California State Department of Education's *Staff Development: Inservice Education Models).* Council members have taught teachers in teacher-training programs and have talked with teachers in title I schools and with families of children attending these schools.

The membership of the Council changed greatly in September 1971, interrupting this investigation prematurely. Although the study is not yet in final form, the Council feels that it must make these preliminary, general comments.

The NACEDC recommends that USOE undertake a data search to identify title I funds which are used for teacher training. Despite repeated requests, USOE has been unable to provide that information this year, due to inadequate cataloging.

The NACEDC further recommends that DCE earmark any funds spent by other programs for teacher training in poverty-level schools, and provide this information to the Council.

Desegregation

Compensatory education requires teachers who are especially prepared to offer such education. Because of the highly specialized nature of compensatory education, many of these teachers are ill-equipped to cope with the problems of children who have specialized educational needs. Special training for all teachers who work in compensatory education should be considered.

The NACEDC recommends that teacher training include sufficient preservice and inservice courses to prepare all teachers for the future possibility of desegregation plans in the school district in which they find employment.

The NACEDC recommends that teachers who are employed in title I projects have backgrounds which sufficiently prepare them to work in this highly specialized field.

Teacher Preparation

In general, teacher education programs are not noted for their sensitivity to cultural needs and are slow to adjust to changes in the structure and demands of society. Can this be attributed to the lack of commitment of top administration due to insensitivity to the needs out in the field?

It is often said that most of our college instructors are far removed from the realities in our schools. Professors should realize this increasingly and follow the steps taken by a professor at Arizona State University, who took a year's leave of absence so that he could teach in a *barrio* school. He suffered a slight salary cut, but he claims the experience has completely changed his methods and the content of his classes.

Some institutions of higher learning with a firm commitment to assisting teachers interested in working with disadvantaged youth have developed a master's degree program in this area. The following is a program recommended by John L. O'Brien in the book *Preparing To Teach The Disadvantaged.*

1. An orientation experience that will sensitize him to the world of youth with special needs.
2. An understanding of the characteristics of the population to be taught.
3. Basic sociological, psychological, education, anthropological, and literary concepts dealing with the disadvantaged.
4. Direct experiences to develop an understanding of the culture of the disadvantaged.
5. An integrating experience that is composed of selected educational processes such as teaching methodology, program development, curriculum development, and evaluation—all with special emphasis on teaching the disadvantaged.
6. A supervised teaching experience with a student population that is disadvantaged in some way—for example, socially, culturally, economically—and whose educational achievement has been limited.
7. A supervised work experience under the direction of a professional worker. The purpose of this experience is to give the students an understanding of agency structure and agency programs dealing with the poor and the disadvantaged.
8. A seminar that will provide an opportunity to integrate and relate issues that have grown out of the experiences of the curriculum.
9. An opportunity (a) to investigate a problem related to the youth with special needs and to report this in a master's paper, or (b) to evaluate the total experience received in the master's program and to report this in an

evaluation paper. Both of these experiences provide the student with a vehicle to integrate his experiences and knowledge gained and to apply them to his own professional improvement.

Have we really made a concentrated effort to focus on the needs of our teachers who are faced with changing school enrollments—who at one time taught children of doctors, lawyers, and other professional people and now find their class memberships made up of children from the ghettos and barrios—children with different languages and sets of needs?

Federal agencies, such as USOE's Bureau of Educational Personnel Development, are concentrating their efforts on providing inservice training for teachers of disadvantaged children. Institutes on bilingual education, special-education teacher development for desegregating schools, and training of teacher trainers are among the many being conducted by the Bureau of Educational Personnel Development. Many subprograms are now operating, with excellent results being shown.

Federal funding and projects, however, are not enough and will never meet the needs of every district that provides services for disadvantaged children. Therefore, the Council recommends that the following be set in motion:

1. *That every LEA be required to assess teacher needs for inservice training and, upon completion of assessment, make well-planned training programs part of the title I proposal.*
2. *That such programs be evaluated and information on effective programs be disseminated.*

CONCLUSION

As the Council reviewed the progress of implementation of title I since it was enacted in 1965, several conclusions stood out. This was the first legislation to focus efforts on assisting the education of children who are disadvantaged and have difficulties in learning. It was by far the largest grant of Federal aid ever made to local schools. Neither the schools nor the Government had had previous experience in this kind of partnership. Painful difficulties have been experienced as the thousands of school districts have sought to use the opportunity title I provides to improve the education of disadvantaged children.

During the 1st year of operation, the appropriation was not passed until well after the school year had begun and the funds did not reach the schools until much later. Then it was too late to obtain key personnel and many schools used the funds largely to obtain supplies and equipment. The lateness of appropriations has been a continuing problem since 1965, but the schools are increasingly anticipating the availability of funds and are planning accordingly.

Identifying children most in need of special assistance and developing a workable delivery system to reach them has been a second serious problem which is being gradually, but not fully, worked out. As the Council points out earlier in this report, there is still great need for improvement in the delivery system.

A third continuing problem has been the lack of concentration of effort on those children most in need. Naturally, in the early years, the schools responded to pressures to furnish funds for all eligible children, but this scattered the efforts so widely that little effect was produced. Painfully, many schools are learning to resist pressure for wide distribution of funds and are focusing larger efforts on a smaller number of children so that a real difference in their learning is possible.

A fourth problem is that of obtaining constructive cooperation between the home and the school to further the education of children. In general, children who do well in school are encouraged and aided by parents as well as by teachers. Children who have great difficulties in learning can be helped much more effectively when their parents and teachers can work together on their education. This was not recognized by many schools in the early years of title I, but parent involvement has become the official policy of the program more recently. As the Council suggests in this report, procedures for assuring parent involvement are still inadequate.

A fifth problem has been to develop constructive title I programs in those schools in which desegregation is taking place. Desegregation commonly reduces the concentration of disadvantaged children within the school. Normally this would eliminate the eligibility for assistance of many of the most seriously disadvantaged. Ways of reaching the children who most need the aid when they are distributed among desegregated schools are still being worked out.

A sixth problem has also been emphasized in this report, that of providing services to disadvantaged children in nonpublic schools. Some States and some local districts have worked out practicable programs, but many eligible children in nonpublic schools are not being reached.

Perhaps the most serious problem, because it requires further education and experience on the part of thousands of school teachers and administrators, is to develop and operate instructional programs that enable disadvantaged students to learn more adequately. This is a new task for schools. When there was need for a large number of unskilled laborers, education was not necessary for the employment of a large fraction of our people. When our political and social life was less complex, school learning was not a necessary basis for becoming a constructive citizen. Hence, the schools were expected to teach those who responded readily to school work and to discourage those who had difficulty in learning. To make title I effective, ways of instructing disadvantaged children must be much more widely understood and practiced.

These serious problems are now recognized and being solved, although slowly and in some cases imperfectly. Title I has contributed in spectacular fashion to focusing the attention of the public and professional educators upon the plight of disadvantaged children attempting to gain an education. This concern needs to be maintained and progress in improving such education needs to be encouraged and accelerated. The Council's investigation in 1968 indicated that about one-quarter of the programs then were bringing results. Today, the estimate is that more than one-third of the title I programs are facilitating the education of disadvantaged children. This is slow progress, but we cannot overlook the difficulties listed above and the massive nature of America's decentralized educational system. Universal education is still highly important for the children concerned and for the maintenance of our Nation. The Council believes that we need not be disheartened by our experience with title I. The task has not been completed. It is more difficult than we thought. Progress has been slower than we had hoped, but we are improving. Our efforts must be continued until universal education for American children has been achieved.